

Submission Cherwell Local Plan 2011 – 2031 (Part 1)

Partial Review – Oxford’s Unmet Housing Need

Proposed Modifications

**Addendum to
Statement of Consultation**

February 2020

Introduction

1. Cherwell District Council has consulted on modifications to the Submission Cherwell Local Plan 2011-2031 (Part 1) Partial Review – Oxford’s Unmet Housing Need, including modified Policies Maps and an update to the Sustainability Appraisal. The documents were published for consultation from 8 November 2019 to 20 December 2019 prior to submission to the Secretary of State for Housing, Communities and Local Government.
2. The Draft Partial Review of the Cherwell Local Plan was submitted to the Secretary of State for public examination on Monday 5 March 2018. The Council submitted the Proposed Submission Local Plan (July 2017) accompanied by Focused Changes and Minor Modifications (February 2018). The Submission Policies Map was included within the documents.
3. The Submission Local Plan was also accompanied by a Statement of Consultation (CD PR93) which detailed previous stages of consultation undertaken in preparing the Plan. The Statement remains part of the Local Plan evidence base and is available online at <https://www.cherwell.gov.uk/info/112/evidence-base/369/local-plan-part-1-partial-review---evidence-base>. A separate Duty to Cooperate Paper (February 2018) (CD PR90) was also submitted. An Addendum to the Duty to Cooperate Paper (CD PR115) was prepared in September 2019 which supplements, and should be read alongside, the Duty to Cooperate Paper. It provides details of the further work undertaken by the Council subsequent to the Inspector’s Post Hearings Advice Note (Document PC5).
4. A Preliminary Hearing took place on 28 September 2018. Main hearings were held between 5 and 13 February 2019.
5. The Inspector’s Post-Hearings Advice Note (Document PC5) was received on 13th July 2019. In the Note the Inspector confirmed his preliminary conclusions that:
 - the 4,400 dwellings figure that represents Cherwell’s apportionment of Oxford’s unmet housing need provides a sound basis for the Plan;
 - the approach of locating the housing and infrastructure required as close as possible to Oxford, along the A44 and A4165 transport corridors, is an appropriate strategy;
 - the pressing need to provide homes, including affordable homes, to meet the needs of Oxford, that cannot be met within the boundaries of the city, in a way that minimises travel distances, and best provides transport choices

- other than the private car, provide the exceptional circumstances necessary to justify alterations to Green Belt boundaries;
- on density, whilst some additional capacity may be possible, the Council has struck a broadly sensible balance between the extent of land proposed to be removed from the Green Belt, and the need to accommodate development that respects its context; and
 - in transport terms, the principle of siting the required allocations along an established transport corridor is a sound one.
6. The Inspector also advised that, with the exception of site PR10 (land South East of Woodstock), he considers the site allocations and the process by which they have been arrived at as being sound in principle.
7. The Inspector indicated that the major change required to make the Plan sound is the deletion of Policy PR10, Land South East of Woodstock.
8. Following the receipt of the Inspector's Advice Note the Council has engaged with a range of key stakeholders, interested parties and site promoters in the preparation of the proposed modifications.
9. This addendum provides an account of the consultation undertaken since the February 2019 hearings. It also explains how the Proposed Modifications have been publicly consulted upon and provides a summary of the responses received.

Consultation post February 2019 Hearings

10. The Inspector requested that following the Hearings in February 2019 the Council submit a Transport Technical Note (CD HEAR 1) and a Housing Figures Note (CD HEAR 2). The two notes, together with Statements of Common Ground and other documents submitted during or following the Hearings were the subject of an informal consultation ending on 4 April 2019. Participants from the Hearing sessions were invited to make submissions and the Council was provided with an opportunity to respond to the submissions received by the Inspector.
11. A total of 38 submissions were received. Full copies of each submission and the Council's responses can be viewed online at <https://www.cherwell.gov.uk/info/83/local-plans/515/local-plan-part-1-partial-review---examination/9>.
12. A list of respondents is shown in Table 1 below.

Table 1 - List of Respondents

Respondent
Aiden Applegarth
Andrew Hornsby-Smith
Begbroke & Yarnton Green Belt Campaign
Bloombridge
Cherwell Development Watch Alliance
Daniel Scharf
David Lock Associates for PR8 parties
Edgars for Mr & Mrs Tomes
Graham Thompson
GreenWay Oxfordshire
Harbord Road Area Residents
Ian Middleton for North Oxford Green Party
Keith Johnston
Kidlington Development Watch
Lynne Whitley
Pegasus Group for Hill Residential & Barwood Securities
Red Kite for Kidlington Parish Council
Savills for North Oxford Consortium
Terence O'Rourke for Vanbrugh Unit Trust & Pye Homes
Turnberry for Exeter College
West Oxfordshire District Council
Woodstock Town Council
Yarnton Parish Council

Duty to Co-operate

13. The Council received the Inspector's Post-Hearings Advice Note (PC5) on 13 July 2019 and published it on the Council's website on 15 July 2019.
14. The preparation of proposed Main modifications was informed by further engagement with Oxfordshire County Council, the site promoters of all sites proposed for allocation in the Local Plan and the relevant 'prescribed bodies' for the purposes of implementing Section 33A of the 2004 Act.

Neighbouring Authorities	
Aylesbury Vale District Council	<p>Informal notification of preliminary Main Modifications preparation and discussions in September 2019.</p> <p>Main matters addressed:</p> <ul style="list-style-type: none"> • The Inspector's post hearing advice note • How the 410 homes at the PR10 (Land south East of Woodstock) could be redistributed • Current timetable for the main modifications

	<ul style="list-style-type: none"> without prejudice, Aylesbury's initial thoughts <p>No cross-boundary strategic issues were raised by the proposed modifications.</p>
Buckinghamshire County Council	<p>Unable to make contact prior to the publication of the modifications. No response received on the published Main Modifications.</p>
Northamptonshire County Council (West Northamptonshire Joint Planning Unit)	<p>Informal notification of preliminary Main Modifications preparation and discussions in September 2019.</p> <p>Main matters addressed:</p> <ul style="list-style-type: none"> the Inspector's preliminary advice note received following Hearings in February 2019. the options being considered for modifications in light of the Inspector's view that the strategy is sound but that one proposed housing allocation should be removed the likely direction of travel for the main modifications having regard to changes in circumstances, new information and evidence how the continued and endorsed strategy to locate development in south Cherwell is likely to have limited impact on Northamptonshire the expected programme for the Partial Review going forward how West Northamptonshire JPU are currently undertaking an Issues Consultation on a review of the West Northamptonshire Core Strategy in order to produce a new Strategic Plan for West Northamptonshire working with Daventry District and South Northamptonshire district.
Oxford City Council	<p>Informal notification of preliminary Main Modifications preparation and discussions in September 2019.</p> <p>Main matters addressed:</p> <ul style="list-style-type: none"> the Inspector's preliminary advice the options being considered the likely direction of travel for the main mods having regard to changes in circumstances, new information and evidence; and how this relates to Oxford City discussions with the County Council on infrastructure implications the rationale for options being discounted without prejudice, Oxford's initial thoughts the expected programme going forward timings of the Oxford Local Plan examination <p>Regular updates on modification preparation given at fortnightly liaison meetings for the Oxfordshire Plan 2050 and monthly Heads of Planning meetings which acts as the project board for the Oxfordshire Plan.</p>

Oxfordshire County Council	<p>Following receipt of the Inspector’s advice note CDC sought detailed advice from OCC on the transport, infrastructure, and education implications of redistributing the 410 homes previously proposed at Woodstock.</p> <p>CDC and OCC have worked closely and iteratively on preparing the proposed modifications. This working is enhanced through regular monthly meetings where progress on the modifications is discussed in detail.</p>
South Northamptonshire	<p>Informal notification of preliminary Main Modifications preparation and discussions in September 2019.</p> <p>Main matters addressed:</p> <ul style="list-style-type: none"> • the Inspector’s preliminary advice note received following Hearings in February 2019. • the options being considered for modifications in light of the Inspector’s view that the strategy is sound but that one proposed housing allocation should be removed • the likely direction of travel for the main modifications having regard to changes in circumstances, new information and evidence • how the continued and endorsed strategy to locate development in south Cherwell is likely to have limited impact on Northamptonshire • the expected programme for the Partial Review going forward • how SNDC are currently undertaking an Issues Consultation on a review of the West Northamptonshire Core Strategy in order to produce a new Strategic Plan for West Northamptonshire working with Daventry District and South Northamptonshire district.
South Oxfordshire District Council	<p>Informal notification of preliminary Main Modifications preparation and discussions in September 2019.</p> <p>Main matters addressed:</p> <ul style="list-style-type: none"> • the Inspector’s preliminary advice • the options being considered • the likely direction of travel for the main mods having regard to changes in circumstances, new information and evidence • discussions with the County Council on infrastructure implications • the rationale for options being discounted <p>Regular updates on modification preparation is also given at fortnightly liaison meetings for the Oxfordshire Plan 2050 and monthly Heads of Planning meetings which acts as the project board for the Oxfordshire Plan.</p>

<p>Stratford-on- Avon District Council</p>	<p>Informal notification of preliminary Main Modifications preparation and discussions in September 2019. Main matters addressed:</p> <ul style="list-style-type: none"> • The scope of the Plan (Oxford’s unmet housing needs) and where we are in the process • The basis of the 4,400 homes (countywide cooperative process) • The overall housing need arising from the Oxon SHMA 2014 (c. 100,000) homes which informed the cooperative process • The fact that the adopted Cherwell Local Plan (2015) meets CDC’s needs (22,840 2011-2031) in full and that the 4,400 homes (2011-2031) fully meets Cherwell’s apportionment of Oxford’s unmet needs • The distribution of the housing proposals as submitted in 2018 – all in the southern part of the district near to Oxford • The Inspector’s preliminary advice (July 2019) following main Hearings in February 2019 (including his concern about land next to Woodstock) • The options being considered to address the Inspector’s concerns – all in in the southern part of the district.
<p>Vale of the White Horse District Council</p>	<p>Informal notification of preliminary Main Modifications preparation and discussions in September 2019. Main matters addressed:</p> <ul style="list-style-type: none"> • the Inspector’s preliminary advice • the options being considered • the likely direction of travel for the main mods having regard to changes in circumstances, new information and evidence • discussions with the County Council on infrastructure implications • the rationale for options being discounted <p>Regular updates on modification preparation is also given at fortnightly liaison meetings for the Oxfordshire Plan 2050 and monthly Heads of Planning meetings which acts as the project board for the Oxfordshire Plan.</p>
<p>Warwickshire County Council</p>	<p>Informal notification of preliminary Main Modifications preparation and discussions in September 2019. Main matters discussed included:</p> <ul style="list-style-type: none"> • the partial review of the local plan • the inspector’s request to reallocate the 410 homes at Woodstock • the 410 being redistributed to existing sites to the south of the district

West Oxfordshire District Council	<p>Informal notification of preliminary Main Modifications preparation and discussions in September 2019.</p> <p>Main matters addressed:</p> <ul style="list-style-type: none"> • the Inspector’s preliminary advice • the options being considered • the likely direction of travel for the main modifications having regard to changes in circumstances, new information and evidence; and how this relates to West Oxfordshire • discussions with the County Council on infrastructure implications • the rationale for options being discounted • without prejudice, WODC initial thoughts • the expected programme going forward <p>Regular updates on modification preparation is also given at fortnightly liaison meetings for the Oxfordshire Plan 2050 and monthly Heads of Planning meetings which acts as the project board for the Oxfordshire Plan.</p>
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Prescribed Bodies & Other Bodies	
Civic Aviation Authority (CAA)	Spoke with CAA’s Planning department in September. Advised to speak to London Oxford Airport directly.
London Oxford Airport	Unable to make contact prior to the publication of the modifications. No response received on the published Main Modifications.
Environment Agency	<p>Informal notification of preliminary Main Modifications preparation and discussions in September 2019.</p> <p>Main matters discussed:</p> <ul style="list-style-type: none"> • The Inspector’s preliminary findings contained in his Post Hearings Advice Note, recommending deletion of site PR10 Woodstock and the re-distribution of 410 houses • The options being considered • The likely content of the main modifications • The testing of options through preparation of additional evidence base including Sustainability Appraisal <p>A degree of caution was expressed in terms of flood risk and the need to avoid flood risk areas in considering increased densities/extending developable areas.</p> <p>CDC confirmed that it would have the opportunity to comment on the proposed modifications when published in the usual way. Without prejudice, no other concerns raised.</p>

Homes Agency (previously Homes and Communities Agency)	Regular updates on plan making in Oxfordshire are provided through quarterly Oxfordshire Growth Deal meetings of which Homes England is a participant. Unable to make contact prior to the publication of the modifications. No response received on the published Main Modifications.
Highways England	<p>Informal notification of preliminary Main Modifications preparation and discussions in September 2019.</p> <p>Main matters discussed:</p> <ul style="list-style-type: none"> • the Inspector’s preliminary advice • the options being considered • the likely direction of travel for the main mods having regard to changes in circumstances, new information and evidence • discussions with the County Council on infrastructure implications • the rationale for options being discounted • without prejudice, HE’s initial thoughts • the expected programme going forward <p>Without prejudice, no concerns were raised.</p>
Historic England	Unable to make contact prior to the publication of the modifications. However, formal response received on the published Main Modifications.
Natural England	<p>Informal notification of preliminary Main Modifications preparation and discussions in September 2019.</p> <p>Main matters discussed:</p> <ul style="list-style-type: none"> • The Inspector’s preliminary findings contained in his Post Hearings Advice Note, recommending deletion of site PR10 Woodstock and the re-distribution of 410 houses • The options being considered • The likely content of the main modifications • The testing of options through preparation of additional evidence base including addendums to the Habitats Regulations Assessment, Water Cycle Study and Ecological Advice on Cumulative Impacts <p>NE expressed a degree of caution in terms of any air quality implications from the re-distribution of 410 dwellings in relation to Oxford Meadows SAC. CDC confirmed that there would be the opportunity to comment on the proposed modifications when</p>

	<p>published, in the usual way. Without prejudice, no other concerns were raised.</p> <p>Formal response received on the published main modifications.</p>
NHS England South East Commissioning Board	<p>OCCG cover the majority of functions with exception of dentistry and ophthalmology.</p> <p>Informal notification of preliminary Main Modifications preparation and discussions in September 2019.</p> <p>Main matters discussed:</p> <ul style="list-style-type: none"> • the Inspector’s preliminary advice • the options being considered • the likely direction of travel for the main mods having regard to changes in circumstances, new information and evidence • discussions on infrastructure implications • the rationale for options being discounted • without prejudice, initial thoughts • the expected programme going forward <p>Without prejudice, no concerns were raised.</p> <p>Regular liaison meeting between CDC and OCCG where updates on Partial Review are given. Last meeting August 2019.</p>
Office of Rail and Road (Office of Rail Regulation)	<p>Unable to make contact prior to the publication of the modifications. No response received on the published Main Modifications.</p>
Oxfordshire Clinical Commissioning Group (OCCG)	<p>Informal notification of preliminary Main Modifications preparation and discussions in September 2019.</p> <p>Main matters discussed:</p> <ul style="list-style-type: none"> • the Inspector’s preliminary advice • the options being considered • the likely direction of travel for the main mods having regard to changes in circumstances, new information and evidence • discussions on infrastructure implications • the rationale for options being discounted • without prejudice, OCCG’s initial thoughts • the expected programme going forward <p>Without prejudice, no concerns were raised.</p> <p>In addition, regular liaison meetings take place between CDC and OCCG where updates on Partial Review are given. Last meeting August 2019.</p>
Oxfordshire Local Enterprise Partnership	<p>Frequent updates on progress of the Modifications to the Plan through regular liaison meetings for the Oxfordshire Plan 2050 and monthly Heads of Planning</p>

	meetings which acts as the project board for the Oxfordshire Plan.
The Oxfordshire Environment Board	Unable to make contact prior to the publication of the modifications. No response received on the published Main Modifications.
Sport England	Meeting in August 2019. Briefed on Inspector's advice note and the needs to reassess options for 410 dwellings.
Scottish & Southern Electric	<p>Informal notification of preliminary Main Modifications preparation and discussions in September 2019.</p> <p>Main matters discussed:</p> <ul style="list-style-type: none"> • the Inspector's preliminary advice • the options being considered • the likely direction of travel for the main mods having regard to changes in circumstances, new information and evidence; and how this relates to infrastructure • discussions with the County Council on infrastructure implications • the rationale for options being discounted • without prejudice, SSE's initial thoughts • the expected programme going forward and future engagement
Thames Water	<p>Informal notification of preliminary Main Modifications preparation and discussions in September 2019.</p> <p>Main matters discussed:</p> <ul style="list-style-type: none"> • the Inspector's preliminary advice • the options being considered • the likely direction of travel for the main mods having regard to changes in circumstances, new information and evidence; and how this relates to Thames Water • discussions with the County Council on infrastructure implications • without prejudice, TW's initial thoughts • the rationale for options being discounted • the expected programme going forward (Main Mods consultation) <p>Without prejudice, no concerns were raised.</p>

15. CDC officers contacted by email the main promoters of sites proposed for allocation inviting them to update the Council on their latest position, including any supporting

information, and any changes in circumstances the Council should take into account having regard to the Inspector's advice note.

16. Engagement with site promoters included:

Site	Promoter	Engagement	Considerations
PR6a – Land East of Oxford Road	Savills (Christ Church, Exeter & Merton Colleges and Oxford University)	<ul style="list-style-type: none"> Request for information sent following receipt of Inspector's advice note. Meeting held in August 2019 	<ul style="list-style-type: none"> 40 more units could be accommodated in PR6a as a result of lower school land take requirements. No other change of circumstances. CDC to consider within the context of Inspector's Note (PC5).
PR6b – Land West of Oxford Road	Savills (Christ Church, Exeter & Merton Colleges and Oxford University)	<ul style="list-style-type: none"> Request for information sent following receipt of Inspector's advice note. Meeting held in August 2019 	<ul style="list-style-type: none"> Arboriculture assessment leading to 18.4 net developable hectares and provision of c.740 new dwellings (40dph) CDC to sense check density information. CDC to consider within the context of Inspector's Note (PC5).
PR6c- Land at Frieze Farm	Turnberry (Exeter College)	<ul style="list-style-type: none"> Request for information sent following receipt of Inspector's advice note. Meeting held in August 2019 	<ul style="list-style-type: none"> Allocation of PR6c for up to 410 new dwellings. No change of circumstances. CDC to consider within the context of Inspector's Note (PC5).
PR7a – Land SE Kidlington	Pegasus (Barwood Development Securities Ltd) Hill Residential Ltd	<ul style="list-style-type: none"> Request for information sent following receipt of Inspector's advice note. Meeting held in August 2019 	<ul style="list-style-type: none"> Concept masterplan for c.430 new dwellings on 11.4ha of residential area at 37.5dph CDC to sense check density information within the context of Inspector's Note (PC5).
PR7b – Land at Stratfield Farm	Carter Jonas (Manor Oak Ltd)	<ul style="list-style-type: none"> Request for information sent following receipt of Inspector's advice note. Meeting held in August 2019 	<ul style="list-style-type: none"> Site layout illustrating a scheme for c.165 new dwellings CDC to sense check density information within the context of Inspector's Note (PC5).

Site	Promoter	Engagement	Considerations
PR8 – Land East of the A44	DLA (University of Oxford, Merton College and a private landowner: The Tripartite)	<ul style="list-style-type: none"> Request for information sent following receipt of Inspector's advice note. Meeting held in August 2019 	<ul style="list-style-type: none"> No change in circumstances CDC to consider within the context of Inspector's Note (PC5).
PR8 – Land East of the A44	Carter Jonas (Newcore)	<ul style="list-style-type: none"> Request for information sent following receipt of Inspector's advice note. Meeting held in August 2019 	<ul style="list-style-type: none"> No change in circumstances CDC to consider within the context of Inspector's Note (PC5).
PR8- Land East of the A44	Carter Jonas (Mr M Smith and Mr G Smith)	<ul style="list-style-type: none"> Request for information sent following receipt of Inspector's advice note 	<ul style="list-style-type: none"> No change in circumstances CDC to consider within the context of Inspector's Note (PC5).
PR9 – Land West of Yarnton	Gerald Eve (Merton College)	<ul style="list-style-type: none"> Request for information sent following receipt of Inspector's advice note. Site visit and meeting held in August 2019 	<ul style="list-style-type: none"> 3 development concepts submitted increasing numbers on extended developable areas. CDC to sense check density information CDC to consider within the context of Inspector's Note (PC5).
PR10 – Land South East of Woodstock	Blenheim Estates	<ul style="list-style-type: none"> Request for information sent following receipt of Inspector's advice note. Meeting held in August 2019 	<ul style="list-style-type: none"> Updated development concept (500 new dwellings) CDC to consider within the context of Inspector's Note (PC5).

Consultation on Main Modifications

17. The Main Modifications and supporting documents were made available for public comment for a period of six weeks from 8 November 2019 to 20 December 2019. A

number of minor modifications were also published at the same time, although these were not required to be consulted upon. Comments made had to relate to the proposed modifications and supporting documents only. The Council did not consult on other aspects of the Plan that had previously been consulted upon.

18. Evidence supporting the proposed modifications was made publicly available at the commencement of the consultation. The modifications and all supporting documents remain available online at <https://www.cherwell.gov.uk/info/83/local-plans/515/local-plan-part-1-partial-review---examination/11>.
19. On 9 December 2019, officers held a joint meeting with the affected Parish Councils to answer any questions without prejudice to the Council's position and the examination process.

Responses to Consultation

20. All representations received on the modifications have been published on the Council's website at <https://www.cherwell.gov.uk/info/83/local-plans/515/local-plan-part-1-partial-review---examination/11>. Each has been individually reviewed.
21. A total of 96 representations were received in response to the Council's consultation on the proposed main modifications.
22. A summary of the issues raised against each proposed modification is set out below. However, it should be noted that a significant number of the representations were general in nature. For completeness these representations have also been summarised under the 'general' heading of the summaries.

General Comments

23. The following organisations advised that they had no substantive comments to make on the proposed main modifications and supporting documents:
 - Scottish and Southern Electricity Networks (PR-D-0002)
 - The Forestry Commission (PR-D-0003)
 - National Grid (PR-D-0009)
 - Natural England (PR-D-0012)
 - Environment Agency (PR-D-0053)
 - The Canal and River Trust (PR-D-0059)
 - South Oxfordshire and Vale of White Horse District Councils (PR-D- 0074)
24. Other general comments include:

Oxford City Council (PR-D-0076) welcomes the publication of the proposed modifications and supports the approach taken and evidence in following through on the Inspector's recommendations.

Historic England (PR-D-0072) advise that the proposed modifications do not substantively change their position as set out in its statement of common ground agreed on 4 February 2018 and addendum statement on 8 February 2019. However, the increased densities now proposed on some of the allocated sites could reduce the scope for the outcomes of archaeological investigation to be incorporated in to the development schemes. This will therefore need to be given particular attention, as plans for such sites develop, through both the plan-making and development management processes.

Gosford and Water Eaton PC (PR-D-0086) made the following points:

- We wish to reiterate our view that this proposal is inappropriate and excessive, both in size and location;
- Area PR7a, in the parish, has had its housing allocation almost doubled, this further increases our concerns about traffic, pollution etc;
- An increased allocation to other adjacent areas further exacerbates issues with reduction of the green gap between Oxford and Kidlington;
- The current burial site allocation will not be sufficient for future use with the increase in housing;
- The increase in allocation for housing in area PR7a significantly reduces the area allocated to sports provision and green space;
- The potential Oxford to Cambridge Expressway along the route of the A34 would have significant noise and pollution effect on PR7a's extended site.

One response criticised the timing of the consultation (PR-D-0001)

One response supported the Plan particularly the closure of Sandy Lane (PR-D-0007).

One response (PR-D-0013) made no specific comments on the modifications but was generally supportive of Policy PR8.

12 representations made general objections to the proposals in the Plan but did not comment on specific modifications. (PR-D-0005, PR-D-0011, PR-D-0015, PR-D-0040, PR-D-0042, PR-D-0049, PR-D-0050, PR-D-0066, PR-D-0079, PR-D-0089, PR-D-0095, PR-D-0096).

The main issues raised on each of the proposed Main Modifications, and an officer response, is set out in the Annex 1 below.

ANNEX 1

Representations – Summary of Issues Raised and Officer Response

Modification Number	Comment/Issue	Representation Number	Officer Response
<p>Main 3</p> <p><i>(P.9; Executive Summary Table 1; Policy PR6a-Land east of Oxford Road)</i></p> <p>Replace '650' with '<u>690</u>'</p>	<ul style="list-style-type: none"> • The proposed main modification is supported. • Concern raised over the further release of Green Belt land to accommodate additional homes. • Intensification of existing allocations is not supported. • Green Belt release at Kidlington gap is inappropriate given that: <ul style="list-style-type: none"> ○ The SHMA numbers do not reflect need and are therefore not considered exceptional circumstances ○ Sites outside the Green Belt should be prioritised ○ The Kidlington Gap is of great strategic importance in relation to the Oxford Green Belt and development that would have the effect of closing it is inappropriate. • The Burley in Wharfdale decision by the Secretary of State (3208020) is highlighted as supporting argument in respect to the application of Paragraph 11(b) of the NPPF and contend that there are no exceptional circumstances to justify the release of Green Belt. • The current version of the Plan should be rejected as it stands. It should be revisited when the final numbers 	<p>PR-D-0010 (North Oxford Consortium)</p> <p>PR-D-0067 (CPRE)</p> <p>PR-D-0083 (CDWA)</p> <p>PR-D-0093 (KDW)</p>	<p>Noted</p> <p>This modification relates to the Executive Summary in the Plan. This change is a consequence of the substantive modification at MM 17 and MM 59.</p> <p>Reference should therefore be made to the full response under MM 17.</p> <p>The Burley in Wharfdale decision by the Secretary of State (3208020) is noted.</p> <p>However, Green Belt very special circumstances (NPPF para' 87- planning applications) and exceptional circumstances (NPPF para' 82- Green Belt reviews) are respectively site and Plan specific. Further and in any event, the application of Green Belt tests is necessarily fact specific. The conclusions reached in respect of the area of Green Belt with which the Burley in Wharfdale decision was concerned cannot determine the</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
	<p>for Oxford have been examined, adopting higher densities and prioritising protection of the Green Belt.</p> <ul style="list-style-type: none"> • Green Belt should only be removed in exceptional circumstances. • The importance of Kidlington Gap as a separation between Oxford and Kidlington was raised at the examination but this will be all but obliterated. This is contrary to the spatial strategy in the adopted Cherwell Local Plan and the NPPF. • The Council should consider alternative sites outside the Green Belt. • The deletion of site PR10 and resultant reallocation of dwellings to the other strategic sites means the release of additional Green Belt. Alternative sites or strategies have not been properly considered. • Object to housing development in the Green Belt, the effective ‘infill’ of the Kidlington Gap and the loss of separation between the villages and between villages and Oxford, the loss of the North Oxford Golf Club, and the significant flaws in the Transport strategy and the closure of Sandy Lane. • The justification for removing additional Green Belt land is based on a supplementary LUC report which contradicts the original report. • The additional Oxford allocations along existing transport corridors could be extended to include sites with good rail links outside the Green Belt. • Traffic problems at Kidlington Roundabout will be worsened. 		<p>outcome of the Green Belt exceptional circumstances test in Cherwell. The Partial Review is being examined under NPPF 2012. Exceptional circumstances were discussed extensively at the hearings, following consideration of all the evidence the Inspector reached a judgement concluding in his preliminary advice note (document PC5) that exceptional circumstances exist in the individual case of the Partial Review but noted that the Council would need to demonstrate exceptional circumstances for any further changes. (Refer to full response under MM17)</p> <p>The Inspectors examining the Oxford City Local Plan published their preliminary findings in January 2020. They concluded that the capacity-based requirement as proposed to be modified by the City Council did not result in ‘meaningfully different implications for planning in the wider Oxfordshire area compared with the assumptions used by the Growth Board, and do not raise any significant new issues in respect of the unmet need. Having regard to these conclusions there can be no reason for delaying the Partial Review Plan.</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
<p>Main 4</p> <p><i>(P.9; Executive Summary Table 1; Policy PR6b- Land West of Oxford Road)</i></p> <p>Replace '530' with '<u>670</u>'</p>	<ul style="list-style-type: none"> • The proposed main modification is supported. • Concern raised over the further release of Green Belt land to accommodate additional homes. • Intensification of existing allocations is not supported. • The addition of 140 homes on site PR6b is not compliant with the Duty to Cooperate due to no contact with Oxford City councillors • It will lead to the felling of many mature trees and the vision for an attractively landscaped site PR6b will not be achieved • The Modification is inconsistent with national policy to reduce net carbon emissions as felling of mature trees will reduce carbon capture by trees • The word 'primarily' should be deleted from the modification • Green Belt release at Kidlington Gap is inappropriate given that: <ul style="list-style-type: none"> ○ The SHMA numbers do not reflect need and are therefore not considered exceptional circumstances ○ Sites outside the Green Belt should be prioritised ○ The Kidlington Gap is of great strategic importance in relation to the Oxford Green Belt and development that would have the effect of closing it is inappropriate. 	<p>PR-D-0010 (North Oxford Consortium)</p> <p>PR-D-0068 (Cllr P Buckley)</p> <p>PR-D-0067 (CPRE)</p> <p>PR-D-0083 (CDWA)</p> <p>PR-D-0093 (KDW)</p>	<p>Noted</p> <p>This modification relates to the Executive Summary in the Plan. This change is a consequence of the substantive modification at MM 18.</p> <p>Reference should therefore be made to the full response under MM 18.</p> <p>The Plan, including its MMs, has been prepared in compliance with the Duty to Cooperate as detailed in documents PR90 DtC Statement and PR115 DtC Addendum.</p> <p>The Burley in Wharfedale decision by the Secretary of State (3208020) is noted. However, Green Belt very special circumstances (NPPF para' 87- planning applications) and exceptional circumstances (NPPF para' 82- Green Belt reviews) are respectively site and Plan specific. Further and in any event, the application of Green Belt tests is necessarily fact specific. The conclusions reached in respect of the area of Green Belt with which the Burley in Wharfedale decision was concerned cannot determine the</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
	<ul style="list-style-type: none"> • The Burley in Wharfdale decision by the Secretary of State (3208020) is highlighted as supporting argument in respect to the application of Paragraph 11(b) of the NPPF and contend that there are no exceptional circumstances to justify the release of Green Belt. • The current version of the Plan should be rejected as it stands. It should be revisited when the final numbers for Oxford have been examined, adopting higher densities and prioritising protection of the Green Belt. • The increase in density of site PR6b has been proposed without consideration of the many trees on the site, contrary to other policies in the adopted Local Plan which are in place to protect trees, ecological systems and green infrastructure. • Green Belt should only be removed in exceptional circumstances. • The importance of Kidlington Gap as a separation between Oxford and Kidlington was raised at the examination but this will be all but obliterated. This is contrary to the spatial strategy in the adopted Cherwell Local Plan and the NPPF. • The Council should consider alternative sites outside the Green Belt. • The deletion of site PR10 and resultant reallocation of dwellings to the other strategic sites means the release of additional Green Belt. Alternative sites or strategies have not been properly considered. • Object to housing development in the Green Belt, the effective 'infill' of the Kidlington Gap and the loss of separation between the villages and between villages 		<p>outcome of the Green Belt exceptional circumstances test in Cherwell. The Partial Review is being examined under NPPF 2012. Exceptional circumstances were discussed extensively at the hearings, following consideration of all the evidence the Inspector reached a judgement concluding in his preliminary advice note (document PC5) that exceptional circumstances exist in the individual case of the Partial Review but noted that the Council would need to demonstrate exceptional circumstances for any further changes. (Refer to full response under MM17)</p> <p>The Inspectors examining the Oxford City Local Plan published their preliminary findings in January 2020. They concluded that the capacity-based requirement as proposed to be modified by the City Council did not result in 'meaningfully different implications for planning in the wider Oxfordshire area compared with the assumptions used by the Growth Board, and do not raise any significant new issues in respect of the unmet need. Having regard to these conclusions there can be no reason for delaying the Partial Review Plan.</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
	<p>and Oxford, the loss of the North Oxford Golf Club, and the significant flaws in the Transport strategy and the closure of Sandy Lane.</p> <ul style="list-style-type: none"> • The justification for removing additional Green Belt land is based on a supplementary LUC report which contradicts the original report. • There are no exceptional circumstances, endorsed by the affected communities, to justify the release of Green Belt. • The additional Oxford allocations along existing transport corridors could be extended to include sites with good rail links outside the Green Belt. • Traffic problems at Kidlington Roundabout will be worsened. 		<p>The references to the word 'primarily' being deleted do not relate to this specific modification.</p>
<p>Main 5</p> <p><i>(P.9; Executive Summary Table 1; Policy PR7a- Land South East of Kidlington)</i></p> <p>Replace '230' with '430'</p>	<ul style="list-style-type: none"> • Supports proposed modification. • The deletion of site PR10 and resultant reallocation of dwellings to the other strategic sites means the release of additional Green Belt. Alternative sites or strategies have not been properly considered. • Object to housing development in the Green Belt, the effective 'infill' of the Kidlington Gap and the loss of separation between the villages and between villages and Oxford, the loss of the North Oxford Golf Club, and the significant flaws in the Transport strategy and the closure of Sandy Lane. 	<p>PR-D-0014 (Pegasus for Barwood)</p> <p>PR-D-0061 (RPS for Mr R Davies)</p> <p>PR-D-0067 (CPRE)</p> <p>PR-D-0081 (Turnberry for Exeter College)</p> <p>PR-D-0083 (CDWA)</p> <p>PR-D-0087 (Edgars for Mr and Mrs Tomes)</p>	<p>Noted</p> <p>This modification relates to the Executive Summary in the Plan. This change is a consequence of the substantive modification at MM 19.</p> <p>Reference should therefore be made to the full response under MM 19.</p> <p>The Inspectors examining the Oxford City Local Plan published their preliminary findings in January 2020. They concluded that the capacity-based requirement as proposed to be modified by the City Council did not result</p>

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	<ul style="list-style-type: none"> • The justification for removing additional Green Belt land is based on a supplementary LUC report which contradicts the original report. • There are no exceptional circumstances, endorsed by the affected communities, to justify the release of Green Belt. • The additional Oxford allocations along existing transport corridors could be extended to include sites with good rail links outside the Green Belt. • Traffic problems at Kidlington Roundabout will be worsened. • Green Belt should only be removed in exceptional circumstances. • The importance of Kidlington Gap as a separation between Oxford and Kidlington was raised at the examination but this will be all but obliterated. This is contrary to the spatial strategy in the adopted Cherwell Local Plan and the NPPF. • The Council should consider alternative sites outside the Green Belt. • Green Belt release at Kidlington gap is inappropriate given that: <ul style="list-style-type: none"> ○ The SHMA numbers do not reflect need and are therefore not considered exceptional circumstances ○ Sites outside the Green Belt should be prioritised ○ The Kidlington Gap is of great strategic importance in relation to the Oxford Green Belt 	PR-D-0093 (KDW)	<p>in ‘meaningfully different implications for planning in the wider Oxfordshire area compared with the assumptions used by the Growth Board, and do not raise any significant new issues in respect of the unmet need. Having regard to these conclusions there can be no reason for delaying the Partial Review Plan.</p> <p>The Burley in Wharfedale decision by the Secretary of State (3208020) is noted. However, Green Belt very special circumstances (NPPF para’ 87- planning applications) and exceptional circumstances (NPPF para’ 82- Green Belt reviews) are respectively site and Plan specific. Further and in any event, the application of Green Belt tests is necessarily fact specific. The conclusions reached in respect of the area of Green Belt with which the Burley in Wharfedale decision was concerned cannot determine the outcome of the Green Belt exceptional circumstances test in Cherwell. The Partial Review is being examined under NPPF 2012. Exceptional circumstances were discussed extensively at the hearings, following consideration of all the evidence the Inspector reached a judgement concluding in his preliminary advice note (document PC5) that exceptional circumstances exist in the individual case of the Partial Review but noted</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
	<p>and development that would have the effect of closing it is inappropriate.</p> <ul style="list-style-type: none"> • The Burley in Wharfedale decision by the Secretary of State (3208020) is highlighted as supporting argument in respect to application of Paragraph 11(b) of the NPPF and contend that there are no exceptional circumstances to justify the release of Green Belt. • The current version of the Plan should be rejected as it stands. It should be revisited when the final numbers for Oxford have been examined, adopting higher densities and prioritising protection of the Green Belt. • The modification should be deleted due to a lack of explanation or consultation regarding the proposed bus gate. • Concern raised over the further release of Green Belt land to accommodate additional homes. • Intensification of existing allocations is not supported. • The proposed main modification does not represent the most appropriate strategy for development. • The proposed main modification fails under the terms of paragraph 84 of the NPPF which requires LPAs, when reviewing Green Belt boundaries, to take account of the need to promote sustainable patterns of development and the need to consider the consequences for sustainable development in their choices. • The Council's preferred approach has departed from the advice provided by the Inspector. • PR6c is a more appropriate site and could accommodate 220 dwellings. Evidence on landscape, 		<p>that the Council would need to demonstrate exceptional circumstances for any further changes. (Refer to full response under MM19)</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
	<p>Green Belt and transport is provided in support of arguments.</p> <ul style="list-style-type: none"> • Issues of the additional release of Green Belt at PR7a are: <ul style="list-style-type: none"> ○ the proposed southern boundary being weak or non-existent. ○ It could set a dangerous precedent for further release between Kidlington and the A34. ○ It leaves a large triangular field in which development will be difficult to resist. • An incremental approach to Green Belt harm is caused. 		
<p>Main 6</p> <p><i>(P.9; Executive Summary Table 1; Policy PR7b- Land at Stratfield Farm)</i></p> <p>Replace '100' with '120'</p>	<ul style="list-style-type: none"> • The deletion of site PR10 and resultant reallocation of dwellings to the other strategic sites means the release of additional Green Belt. Alternative sites or strategies have not been properly considered. • Object to housing development in the Green Belt, the effective 'infill' of the Kidlington Gap and the loss of separation between the villages and between villages and Oxford, the loss of the North Oxford Golf Club, and the significant flaws in the Transport strategy and the closure of Sandy Lane. • The justification for removing additional Green Belt land is based on a supplementary LUC report which contradicts the original report. • There are no exceptional circumstances, endorsed by the affected communities, to justify the release of Green Belt. • The additional Oxford allocations along existing transport corridors could be extended to include sites with good rail links outside the Green Belt. 	<p>PR-D-0061 (RPS for Mr R Davies)</p> <p>PR-D-0067 (CPRE)</p> <p>PR-D-0083 (CDWA)</p> <p>PR-D-0087</p> <p>PR-D-0093 (KDW)</p>	<p>This modification relates to the Executive Summary in the Plan. This change is a consequence of the substantive modification at MM 20.</p> <p>Reference should therefore be made to the full response under MM 20.</p> <p>The Inspectors examining the Oxford City Local Plan published their preliminary findings in January 2020. They concluded that the capacity-based requirement as proposed to be modified by the City Council did not result in 'meaningfully different implications for planning in the wider Oxfordshire area compared with the assumptions used by the Growth Board, and do not raise any significant new issues in respect of the unmet need.</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
	<ul style="list-style-type: none"> • Traffic problems at Kidlington Roundabout will be worsened. • Green Belt should only be removed in exceptional circumstances. • The importance of Kidlington Gap as a separation between Oxford and Kidlington was raised at the examination but this will be all but obliterated. This is contrary to the spatial strategy in the adopted Cherwell Local Plan and the NPPF. • The Council should consider alternative sites outside the Green Belt. • Green Belt release at Kidlington Gap is inappropriate given that: <ul style="list-style-type: none"> ○ The SHMA numbers do not reflect need and are therefore not considered exceptional circumstances ○ Sites outside the Green Belt should be prioritised ○ The Kidlington Gap is of great strategic importance in relation to the Oxford Green Belt and development that would have the effect of closing it is inappropriate. • The Burley in Wharfdale decision by the Secretary of State (3208020) is highlighted as supporting argument in respect to application of Paragraph 11(b) of the NPPF and contend that there are no exceptional circumstances to justify the release of Green Belt. • The current version of the Plan should be rejected as it stands. It should be revisited when the final numbers for Oxford have been examined, adopting higher densities and prioritising protection of the Green Belt. 		<p>Having regard to these conclusions there can be no reason for delaying the Partial Review Plan.</p> <p>The Burley in Wharfdale decision by the Secretary of State (3208020) is noted. However, Green Belt very special circumstances (NPPF para’ 87- planning applications) and exceptional circumstances (NPPF para’ 82- Green Belt reviews) are respectively site and Plan specific. Further and in any event, the application of Green Belt tests is necessarily fact specific. The conclusions reached in respect of the area of Green Belt with which the Burley in Wharfdale decision was concerned cannot determine the outcome of the Green Belt exceptional circumstances test in Cherwell. The Partial Review is being examined under NPPF 2012. Exceptional circumstances were discussed extensively at the hearings, following consideration of all the evidence the Inspector reached a judgement concluding in his preliminary advice note (document PC5) that exceptional circumstances exist in the individual case of the Partial Review but noted that the Council would need to demonstrate exceptional circumstances for any further changes. (Refer to full response under MM20)</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
	<ul style="list-style-type: none"> • Concern raised over the further release of Green Belt land to accommodate additional homes. • Intensification of existing allocations is not supported. • The proposed main modification does not represent the most appropriate strategy for development. • The proposed main modification fails under the terms of paragraph 84 of the NPPF which requires LPAs, when reviewing Green Belt boundaries, to take account of the need to promote sustainable patterns of development and the need to consider the consequences for sustainable development in their choices. • The Council’s preferred approach has departed from the advice provided by the Inspector. • References made to evidence on landscape, Green Belt and transport that supports the allocation of PR6c site for residential. 	<p>(Edgars for Mr and Mrs Tomes)</p> <p>PR-D-0081 (Turnberry for Exeter College)</p>	
<p>Main 7</p> <p><i>(P.9; Executive Summary Table 1; Policy PR9-Land West of Yarnton)</i></p> <p>Replace '530' with '<u>540</u>'</p>	<ul style="list-style-type: none"> • Green Belt should only be removed in exceptional circumstances. • The importance of Kidlington Gap as a separation between Oxford and Kidlington was raised at the examination but this will be all but obliterated. This is contrary to the spatial strategy in the adopted Cherwell Local Plan and the NPPF. • The Council should consider alternative sites outside the Green Belt. • Extension of the current Green Belt boundary for PR9 involves encroachment onto countryside and Green Belt assessed as high harm in the LUC Cherwell Green Belt Study. It is not warranted by exceptional 	<p>PR-D-0061 (RPS for Mr R Davies)</p> <p>PR-D-0067 (CPRE)</p> <p>PR-D-0082 (B&YGBC)</p> <p>PR-D-0083 (CDWA)</p> <p>PR-D-0093 (KDW)</p>	<p>This modification relates to the Executive Summary in the Plan. This change is a consequence of the substantive modification at MM 21.</p> <p>Reference should therefore be made to the full response under MM 21.</p> <p>The Inspectors examining the Oxford City Local Plan published their preliminary findings in January 2020. They concluded that the capacity-based requirement as proposed to be modified by the City Council did not result in ‘meaningfully different implications for</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
	<p>circumstances and contrary to the sequential approach set out in the NPPF.</p> <ul style="list-style-type: none"> • The land proposed to be released from the Green Belt forms an inherently interesting historic landscape, designed by nature and traditional agricultural land use. It is an important heritage asset and is served by two major footpaths, enjoyed by both local residents and tourists. • The deletion of PR10 is supported but the evidence does not support reallocation of dwellings from PR10, a non-Green Belt site to PR9. it is unsound to remove houses from a non-Green Belt site and release further Green Belt to accommodate them. • Extension of the Green Belt boundary in PR9 will encroach on to the open and elevated countryside to the west of the A44 and will further weaken the westward boundary of the overall Review Plan area. • Extension of the PR9 boundary into land containing ridge and furrow earthworks beyond the current ancient hedgerow will damage the historic landscape setting. The extent of damage to heritage assets would remain unknown until further fieldwork is undertaken. The irretrievable release of Green Belt cannot be provisional on further research that would in fact follow the release of said Green Belt. • Further release of the Green Belt on PR9 would not accord with Local Plan Strategic Objective 15. • The extension of PR9 as proposed by Main 112 and 113 were deemed 'unacceptable' by the Council in its submission for Matter 7. The evidence now produced to reverse this judgement is unsound. 		<p>planning in the wider Oxfordshire area compared with the assumptions used by the Growth Board, and do not raise any significant new issues in respect of the unmet need. Having regard to these conclusions there can be no reason for delaying the Partial Review Plan.</p> <p>The Burley in Wharfedale decision by the Secretary of State (3208020) is noted. However, Green Belt very special circumstances (NPPF para' 87- planning applications) and exceptional circumstances (NPPF para' 82- Green Belt reviews) are respectively site and Plan specific. Further and in any event, the application of Green Belt tests is necessarily fact specific. The conclusions reached in respect of the area of Green Belt with which the Burley in Wharfedale decision was concerned cannot determine the outcome of the Green Belt exceptional circumstances test in Cherwell. The Partial Review is being examined under NPPF 2012. Exceptional circumstances were discussed extensively at the hearings, following consideration of all the evidence the Inspector reached a judgement concluding in his preliminary advice note (document PC5) that exceptional circumstances exist in the individual case of the Partial Review but noted that the Council would need to demonstrate</p>

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	<ul style="list-style-type: none"> • Green Belt release at Kidlington Gap is inappropriate given that: <ul style="list-style-type: none"> ○ The SHMA numbers do not reflect need and are therefore not considered exceptional circumstances ○ Sites outside the Green Belt should be prioritised ○ The Kidlington Gap is of great strategic importance in relation to the Oxford Green Belt and development that would have the effect of closing it is inappropriate. • The Burley in Wharfedale decision by the Secretary of State (3208020) is highlighted as supporting argument in respect to application of Paragraph 11(b) of the NPPF and contend that there are no exceptional circumstances to justify the release of Green Belt. • The current version of the Plan should be rejected as it stands. It should be revisited when the final numbers for Oxford have been examined, adopting higher densities and prioritising protection of the Green Belt. • Intensification of existing allocations is not supported. • Welcomes the deletion of site PR10 however the reallocation of the dwellings across site PR9 will detrimentally impact on sites PR8 and PR9. • Sites PR8 and PR9 are not served by premium bus routes. The Transport Assessment is inaccurate in relation to bus routes. • The proposed park and ride and its associated bus services have been cited as an important element of the rapid transit bus system. However, further data on the impact of the deletion of site PR10 on its viability 		<p>exceptional circumstances for any further changes. (Refer to full response under MM21)</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
	<p>needs to be provided to assess the sustainability of sites PR8 and PR9.</p> <ul style="list-style-type: none"> • There are inaccurate factual representations in the Transport Addendum which indicates the relocation of dwellings away from PR10 will have a positive effect upon overall levels of traffic and congestion at peak times. • The impact of relocating 410 dwellings from site PR10 to sites PR6a, PR6b, PR7a, PR7b and PR9 on the A44 and A4260 has not been assessed. Detailed modelling work needs to be undertaken to ascertain the soundness of this modification to the Plan. • Object to housing development in the Green Belt, the effective 'infill' of the Kidlington Gap and the loss of separation between the villages and between villages and Oxford, the loss of the North Oxford Golf Club, and the significant flaws in the Transport strategy and the closure of Sandy Lane. • The justification for removing additional Green Belt land is based on a supplementary LUC report which contradicts the original report. • The additional Oxford allocations along existing transport corridors could be extended to include sites with good rail links outside the Green Belt. • Traffic problems at Kidlington Roundabout will be worsened. 		
<p>Main 8 <i>(P.9; Executive Summary Table 1; Policy PR10 – Land South East of Woodstock)</i></p>	<ul style="list-style-type: none"> • Agrees with the Inspector's Post Hearing Advice note that site PR10 is too distant from Oxford which is likely to tempt residents away from more sustainable travel choices and welcome its deletion. 	<p>PR-D-0083 (CDWA)</p>	<p>This modification relates to the Executive Summary in the Plan. This change is a consequence of the substantive modification at MM 22 and MM126.</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
Delete Woodstock row from Table 1.	<ul style="list-style-type: none"> • Welcomes the deletion of site PR10 however the reallocation of the dwellings across site PR9 will detrimentally impact on sites PR8 and PR9. • Sites PR8 and PR9 are not served by premium bus routes. The Transport Assessment is inaccurate in relation to bus routes. • The proposed park and ride and its associated bus services have been cited as an important element of the rapid transit bus system. However, further data on the impact of the deletion of site PR10 on its viability needs to be provided to assess the sustainability of sites PR8 and PR9. • There are inaccurate factual representations in the Transport Addendum which indicates the relocation of dwellings away from PR10 will have a positive effect upon overall levels of traffic and congestion at peak times. • The impact of relocating 410 dwellings from site PR10 to sites PR6a, PR6b, PR7a, PR7b and PR9 on the A44 and A4260 has not been assessed. Detailed modelling work needs to be undertaken to ascertain the soundness of this modification to the Plan. 		<p>Reference should therefore be made to the full response under MM126.</p> <p>The general points raised do not relate to this specific main modification.</p>
<p>Main 9</p> <p><i>(Page 12; Paragraph 1.7)</i></p> <p>Amend to read: The Partial Review means change for the area of the district which adjoins north Oxford and that which focuses on the A44</p>	<ul style="list-style-type: none"> • Objects to the further release of Green Belt land to accommodate additional homes at PR9. 	PR-D-0087 (Edgars for Mr & Mrs Tomes)	The substance of this representation does not specifically refer to this proposed modification.

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corridor. from Oxford to Woodstock in West Oxfordshire.			
<p>Main 11</p> <p><i>(P.27; Paragraph 2.10)</i></p> <p>Amend to read: Seven Six residential development areas are identified in a geographic area extending north from Oxford (either side of the A4165 Oxford Road) and along the A44 corridor and to Woodstock in West Oxfordshire.</p> <ol style="list-style-type: none"> 1. Land East of Oxford Road, North Oxford (policy PR6a) - Gosford and Water Eaton Parish 2. Land West of Oxford Road, North Oxford (policy PR6b) - Gosford and Water Eaton Parish 3. Land at South East Kidlington (policy PR7a) - Gosford and Water Eaton Parish 4. Land at Stratfield Farm Kidlington (policy PR7b) - Kidlington Parish 5. Land East of the A44 at Begbroke/Yarnton (policy PR8) - Yarnton and Begbroke Parishes (small area in Kidlington Parish) 	<ul style="list-style-type: none"> • Green Belt should only be removed in exceptional circumstances. • The importance of Kidlington Gap as a separation between Oxford and Kidlington was raised at the examination but this will be all but obliterated. This is contrary to the spatial strategy in the adopted Cherwell Local Plan and the NPPF. • The Council should consider alternative sites outside the Green Belt. • The deletion of site PR10 and resultant reallocation of dwellings to the other strategic sites means the release of additional Green Belt. Alternative sites or strategies have not been properly considered. • Object to housing development in the Green Belt, the effective ‘infill’ of the Kidlington Gap and the loss of separation between the villages and between villages and Oxford, the loss of the North Oxford Golf Club, and the significant flaws in the Transport strategy and the closure of Sandy Lane. • The justification for removing additional Green Belt land is based on a supplementary LUC report which contradicts the original report. • There are no exceptional circumstances, endorsed by the affected communities, to justify the release of Green Belt. • The additional Oxford allocations along existing transport corridors could be extended to include sites with good rail links outside the Green Belt. 	PR-D-0083 (CDWA)	The substance of this representation does not specifically refer to this proposed modification.

Modification Number	Comment/Issue	Representation Number	Officer Response
<p>6. Land West of the A44 at Yarnton (policy PR9) - Yarnton and Begbroke Parishes</p> <p>7 Land East of Woodstock (policy PR10) - Shipton-on-Cherwell and Thrupp Parish.</p>	<ul style="list-style-type: none"> Traffic problems at Kidlington Roundabout will be worsened. 		
<p>Main 12</p> <p><i>(P. 49; Paragraph 3.57)</i></p> <p>Amend to read: 'The Oxford Transport Strategy has three components: mass transit, walking and cycling, and managing traffic and travel demand. The Strategy is supported by the Active and Healthy Travel Strategy and Oxfordshire County Council Cycling and Walking Design Guides. Mass transit in Oxford is planned to consist of rail, Rapid Transit (RT) and buses and coaches.'</p>	<ul style="list-style-type: none"> Modification supported 	<p>PR-D-0085 (Oxfordshire CC)</p>	<p>Noted</p>
<p>Main 14</p> <p><i>(P.53; Paragraph 3.66)</i></p> <p>Amend to read: 'Woodstock is a focus for growth in West</p>	<ul style="list-style-type: none"> A link road between the A40 and the A44 has been promised for several years but there is still no sign of it. 	<p>PR-D-0091(Cllr I Middleton)</p>	<p>Noted. The purpose of MM14 is to provide a cross reference to the LTP4 as part of the wider West Oxfordshire context section of the Plan.</p> <p>The Plan does not rely on the provision of an A40-A44 link road. The link road was</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
<p>Oxfordshire's new, emerging Local Plan. The draft Plan includes more extensive growth at Witney and Chipping Norton, growth at Carterton comparable to that at Woodstock and less significant growth in the Burford-Charlbury Area. Larger strategic development is planned at Eynsham on the A40 to the west of Oxford, the majority of which is intended to address West Oxfordshire's contribution (2750 homes) to Oxford's unmet housing need. <u>Oxfordshire's Local Transport Plan (LTP4): A40 Strategy proposes a new link road in Cherwell between the A40 and the A44 to improve access from West Oxfordshire to the A44 and A34. '</u></p>			<p>discussed during the examination hearings and documented in transport evidence prepared in collaboration with Oxfordshire County Council (Transport Assessment PR52 and Transport Topic Paper PR102). PR102 explains that the link road may deliver strategic benefit in relation to growth allocations being considered in West Oxfordshire (along the A40 corridor) but does not benefit the highway network in the south of the Cherwell District.</p>
<p>Main 15 <i>(P.54; Paragraph 3.73)</i></p> <p>Amend to read, 'A National Infrastructure Commission (NIC) report is expected by the end of on the Cambridge-Milton-</p>	<ul style="list-style-type: none"> Investment opportunities resulting from the Cambridge-Milton Keynes-Oxford Arc have no bearing on the focus of the Plan review of meeting Oxford's unmet housing need and reliance on plans for the Arc is premature as they are still in the planning stages. 	<p>PR-D-0091 (Cllr I Middleton)</p>	<p>Noted. However, the purpose of this MM is to provide an update on the current position regarding this project.</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
<p><u>Keynes-Oxford Arc was published in November 2017</u> including recommendations to the Government linking east-west transport improvements with wider growth and investment opportunities along this corridor'</p>			
<p>Main 17</p> <p><i>(P.64; Table 4; Policy PR6a- Land East of Oxford Road)</i></p> <p>Replace 650 with <u>'690'</u></p>	<ul style="list-style-type: none"> • The proposed main modification is supported. • The land committed for new schools should not be reallocated for housing. • Green Belt should only be removed in exceptional circumstances. • The importance of Kidlington Gap as a separation between Oxford and Kidlington was raised at the examination but this will be all but obliterated. This is contrary to the spatial strategy in the adopted Cherwell Local Plan and the NPPF. • The Council should consider alternative sites outside the Green Belt. • The deletion of site PR10 and resultant reallocation of dwellings to the other strategic sites means the release of additional Green Belt. Alternative sites or strategies have not been properly considered. 	<p>PR-D-0010 (North Oxford Consortium)</p> <p>PR-D-0083 (CDWA)</p> <p>PR-D-0091 (Cllr I Middleton)</p> <p>PR-D-0093 (KDW)</p>	<p>Noted</p> <p>This Main Modification relates to Policy PR6a – Land East of Oxford Road only.</p> <p>In response to the specific issue raised regarding the site allocated for a new school the modification is based on County Council (The Education Authority) advice that a smaller primary school was required at site PR6a than was previously envisaged. This recalculation of need 'freed-up' one hectare of land.</p> <p>In response to the more general points raised in the representations the Explanatory Note (November 2019) describes in detail the process the Council took in preparing Main</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
	<ul style="list-style-type: none"> • Object to housing development in the Green Belt, the effective 'infill' of the Kidlington Gap and the loss of separation between the villages and between villages and Oxford, the loss of the North Oxford Golf Club, and the significant flaws in the Transport strategy and the closure of Sandy Lane. • The justification for removing additional Green Belt land is based on a supplementary LUC report which contradicts the original report. • There are no exceptional circumstances, endorsed by the affected communities, to justify the release of Green Belt. • The additional Oxford allocations along existing transport corridors could be extended to include sites with good rail links outside the Green Belt. • Traffic problems at Kidlington Roundabout will be worsened. 		<p>Modifications. A sequential consideration of options took place to avoid unnecessary further alterations to the Green Belt boundaries and to ensure that, if required, there were exceptional circumstances for further alteration (Explanatory Note).</p> <p>The Inspector in his Preliminary Advice Note (PC5) considered that there were exceptional circumstances for development in the Green Belt but noted that the Council would need to demonstrate exceptional circumstances for any further changes. Consideration was given to whether there were options outside the Green Belt, whether there were options requiring no additional Green Belt release; and in the light of these conclusions, whether there were options within the scope of the existing strategy that would acceptably and exceptionally permit further Green Belt release. It is considered that there are exceptional circumstances justifying some further Green Belt release. All supporting information and evidence were published alongside the Main Modifications (including the consideration of alternatives in a Sustainability Appraisal Addendum) and the process detailed in the Explanatory Note.</p> <p>Evidence supporting the MMs including the landscape and Green Belt evidence do not</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
			<p>contradict previous reports. In their preparation officers undertook an internal review of the plan and existing evidence base in the context of the Inspector’s advice, scoped significant changes in circumstances / new information and identified reasonable options as detailed in the MMs Explanatory Note.</p> <p>The Inspector in his Preliminary Advice Note (PC5) considers the Plan’s proposed housing requirement to be sound and the strategy to be appropriate. In reaching his preliminary conclusions the Inspector considered transport matters including the potential closure of Sandy Lane.</p> <p>The MMs are supported by an Addendum to the Transport Assessment (PR 109) which concludes that, taken together, the proposed redistribution of 410 dwellings in the Council’s MMs ‘are expected to have a net-positive overall effect on previously assessed transport impacts’.</p>
<p>Main 18</p> <p><i>(P.64; Table 4; Policy PR6b- Land West of Oxford Road)</i></p> <p>Replace 530 with <u>‘670’</u></p>	<ul style="list-style-type: none"> The proposed main modification is supported 	<p>PR-D-0010 (North Oxford Consortium)</p>	<p>Noted</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
	<ul style="list-style-type: none"> • It is unclear what ‘additional information on trees’ refers to. • A premature judgement that only important groups of trees should be retained has been made in order to propose that 670 dwellings be allocated to PR6b. • Whilst it is understood that further detailed tree work would be carried out at a later stage the decision to allocate 670 homes without a greater understanding at this stage constrains the ability to make future informed decisions regarding the trees on this site. • The judgement that only important groups of trees should be retained is not justified by the evidence. It has not been based on a comprehensive detailed tree survey but was based on a short visit by Council officers. • The judgement that only significant groups of trees should be retained only takes account of groups of trees and does not consider significant individual trees. The assumption that only groups of trees are important is not valid and is contrary to existing policies. • The Partial Review Strategy was lacking, alternatives to dumping housing in the Green Belt were not properly examined, and the one site outside the Green Belt found unsuitable. • The Examination should be re-opened. • An increase of 140 dwellings on PR6b is not justified. • In a declared Climate Change Emergency, destroying a huge number of established trees on the golf course is unforgivable. 	<p>PR-D-0063 (GreenWay Oxfordshire) PR-D-0070 (Harbord Rd Area Residents Association) PR-D-0083 (CDWA) PR-D-0091 (Cllr I Middleton) PR-D-0092 (Wolvercote Neighbourhood Forum) PR-D-0093 (KDW)</p>	<p>The Explanatory Note (November 2019) describes in detail the process the Council took in preparing Main Modifications. A sequential consideration of options took place to avoid unnecessary further alterations to the Green Belt boundaries and to ensure that, if required, there were exceptional circumstances for further alteration (Explanatory Note).</p> <p>The Inspector in his Preliminary Advice Note (PC5) considered that there were exceptional circumstances for development in the Green Belt but noted that the Council would need to demonstrate exceptional circumstances for any further changes. Consideration was given to whether there were options outside the Green Belt, whether there were options requiring no additional Green Belt release; and in the light of these conclusions, whether there were options within the scope of the existing strategy that would acceptably and exceptionally permit further Green Belt release.</p> <p>It is considered that there are exceptional circumstances justifying some further Green Belt release. All supporting information and evidence were published alongside the Main Modifications (including the consideration of alternatives in a Sustainability Appraisal</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
	<ul style="list-style-type: none"> • Pollution levels nearby are already higher than European and WHO standards. • The Harbord Road Area Residents Association have submitted thorough and extensive evidence on the removal of these trees, and GW endorses that submission. • The destruction of trees is contrary to several local plan policies. • The tree survey conclusions posted by the Council are frankly risible. • The University has confirmed that it wishes to provide staff accommodation on some of the site; that is not 'need' as defined. • The modification should be deleted, and the site and trees omitted from the Partial Review. • Green Belt should only be removed in exceptional circumstances. • The importance of Kidlington Gap as a separation between Oxford and Kidlington was raised at the examination but this will be all but obliterated. This is contrary to the spatial strategy in the adopted Cherwell Local Plan and the NPPF. • The Council should consider alternative sites outside the Green Belt. • The deletion of site PR10 and resultant reallocation of dwellings to the other strategic sites means the release of additional Green Belt. Alternative sites or strategies have not been properly considered. • Object to housing development in the Green Belt, the effective 'infill' of the Kidlington Gap and the loss of 		<p>Addendum) and the process detailed in the Explanatory Note.</p> <p>Evidence supporting the MMs including the landscape and Green Belt evidence do not contradict previous reports. In their preparation officers undertook an internal review of the plan and existing evidence base in the context of the Inspector's advice, scoped significant changes in circumstances / new information and identified reasonable options as detailed in the Explanatory Note.</p> <p>The Inspector in his Preliminary Advice Note (PC5) considers the Plan's proposed housing requirement to be sound and the strategy to be appropriate. In reaching his preliminary conclusions the Inspector considered transport matters including the potential closure of Sandy Lane.</p> <p>The MMs are supported by an Addendum to the Transport Assessment (PR109) which concludes that, taken together, the proposed redistribution of 410 dwellings in the Council's MMs 'are expected to have a net-positive overall effect on previously assessed transport impacts'.</p> <p>In specifically considering the allocation of PR6b the Inspector in his Preliminary Advice</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
	<p>separation between the villages and between villages and Oxford, the loss of the North Oxford Golf Club, and the significant flaws in the Transport strategy and the closure of Sandy Lane.</p> <ul style="list-style-type: none"> • The justification for removing additional Green Belt land is based on a supplementary LUC report which contradicts the original report. • There are no exceptional circumstances, endorsed by the affected communities, to justify the release of Green Belt. • The additional Oxford allocations along existing transport corridors could be extended to include sites with good rail links outside the Green Belt. • Traffic problems at Kidlington Roundabout will be worsened. 		<p>Note concluded that whilst he had no doubt that the North Oxford Golf Club is a much valued facility, <i>'the site it occupies is an excellent one for the sort of housing the Plan proposes, given its location so close to Oxford Parkway, with its Park & Ride, and its proximity to the centre of Oxford.'</i></p> <p>The Council's Explanatory Note on Housing Figures (HEAR 2) clarifies the approach taken to housing figures for the site in the Submission Plan. Table 3 indicates a density of 25 dph for site PR6b in the Proposed Submission Plan. The relatively low density reflected the need for caution on numbers in view of the need to retain significant trees on the site.</p> <p>Following receipt of the Inspector's Advice Note, the review of the Plan, evidence and changes in circumstances identified that there was now more information on important trees that gave reason to reconsider the capacity of the site. This included information from the site promoters and from the Council's internal landscape advisers. Following this internal advice from landscape and tree officers (CD PR124) the Council identified significant groups of trees to be retained and others that were of less importance.</p>

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			<p>As indicated in the Council’s Site Capacity Sense Check (PR110) the densities now proposed could provide the opportunity for higher density typologies, including terrace blocks and apartment buildings. The latter of which could work well with blocks set within a generous green landscape incorporating the tree belts.</p> <p>It is considered that net carbon emissions should be considered as part of a Districtwide approach to Climate Change including the location of development in areas which maximise opportunities for sustainable travel.</p>
<p>Main 19</p> <p><i>(P.64; Table 4; Policy PR7a- Land South East of Kidlington)</i></p> <p>Replace 230 with <u>‘430’</u></p>	<ul style="list-style-type: none"> • Supports proposed modification. • Green Belt should only be removed in exceptional circumstances. • The deletion of site PR10 and resultant reallocation of dwellings to the other strategic sites means the release of additional Green Belt. Alternative sites or strategies have not been properly considered. • Object to housing development in the Green Belt, the effective ‘infill’ of the Kidlington Gap and the loss of separation between the villages and between villages and Oxford, the loss of the North Oxford Golf Club, and 	<p>PR-D-0014 (Pegasus for Barwood Developments)</p> <p>PR-D-0080 (Kidlington PC)</p> <p>PR-D-0083 (CDWA)</p> <p>PR-D-0091 (Cllr Middleton)</p> <p>PR-D-0093 (KDW)</p> <p>PR-D-0086 (Gosford and</p>	<p>Noted</p> <p>The Explanatory Note (November 2019) describes in detail the process the Council took in preparing Main Modifications. A sequential consideration of options took place to avoid unnecessary further alterations to the Green Belt boundaries and to ensure that, if required, there were exceptional circumstances for further alteration.</p> <p>The Inspector in his Preliminary Advice Note (PC5) considered that there were exceptional</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
	<p>the significant flaws in the Transport strategy and the closure of Sandy Lane.</p> <ul style="list-style-type: none"> • The justification for removing additional Green Belt land is based on a supplementary LUC report which contradicts the original report. • There are no exceptional circumstances, endorsed by the affected communities, to justify the release of Green Belt. • The additional Oxford allocations along existing transport corridors could be extended to include sites with good rail links outside the Green Belt. • Traffic problems at Kidlington Roundabout will be worsened. • The importance of Kidlington Gap as a separation between Oxford and Kidlington was raised at the examination but this will be all but obliterated. This is contrary to the spatial strategy in the adopted Cherwell Local Plan and the NPPF. • The Council should consider alternative sites outside the Green Belt. • Object to the release of additional Green Belt as an extension to the area proposed for development of PR7a. • The site extension proposed conflicts with available evidence and is not justified. • There is a lack of evidence and no consideration of mitigation / offset measures as required by the NPPF in justifying the release of Green Belt. • There is no evidence on consideration of the impact on local schools and other community infrastructure close 	<p>Water Eaton PC) did not specifically refer to this modification but made similar comments.</p>	<p>circumstances for development in the Green Belt but noted that the Council would need to demonstrate exceptional circumstances for any further changes.</p> <p>Consideration was given to whether there were options outside the Green Belt, whether there were options requiring no additional Green Belt release; and in the light of these conclusions, whether there were options within the scope of the existing strategy that would acceptably and exceptionally permit further Green Belt release. It is considered that there are exceptional circumstances justifying some further Green Belt release. All supporting information and evidence were published alongside the Main Modifications (including the consideration of alternatives in a Sustainability Appraisal Addendum) and the process detailed in the Explanatory Note.</p> <p>Evidence supporting the MMs including the landscape and Green Belt evidence do not contradict previous reports. In their preparation officers undertook an internal review of the plan and existing evidence base in the context of the Inspector’s advice, scoped significant changes in circumstances / new information and identified reasonable options as detailed in the Explanatory Note (November 2019).</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
	<p>to PR7 as a result of the relocation of 200 dwellings from PR10 to PR7a. The diminished opportunity to meet a local shortfall in playing fields is also not considered in evidence.</p> <ul style="list-style-type: none"> • The perception of a gap between the settlements of Oxford and Kidlington will be eradicated. • Additional vehicles at peak times from the enlarged PR7a will negatively impact the free movement of traffic along the A4260, on Bicester Road, on queues at the roundabout and air quality in Kidlington. • A requirement should be added to Policy PR7a for the provision of a new footbridge across the A4260 to link to Stratfield Brake. • The deletion of site PR10 does not provide exceptional circumstances to allow further encroachment into Green Belt separating Kidlington from Oxford • The lack of parks and recreational facilities within Kidlington will be worsened by the additional housing and loss of Green Belt • There is likely to be a significant loss of biodiversity • The expansion will cause a high level of harm to the purposes of the remaining Green Belt and will have a significant urbanising effect • PR7a is most suitable for higher density development. If an additional 200 dwellings are added to site PR7a then this should be by increased density • There is no consideration of the impact on schools and community infrastructure close to the site 		<p>Specifically, for Land South East of Kidlington the Green Belt Study (PR40, site PR178) indicated that the release of the field immediately to the south of that already proposed in the Plan would have the same impact on the harm to the Green Belt as the proposed submission site.</p> <p>The Green Belt Study Addendum (CD PR104) advised that an additional release of land at PR7a would further erode the gap but would not represent a step-change in Green Belt harm. The Addendum considered two alternative Green Belt boundaries for the southern boundary of the triangle of land. Both involved the creation of a new boundary. The evidence did not suggest a material difference between the two alternative boundaries. The modification proposes a new planted boundary which follows the line of a former field boundary. Once established this will form a strong, defined permanent Green Belt boundary.</p> <p>The proposed modification will result in a reduced area being retained in the Green Belt and available for formal sports for the development and the wider community and green infrastructure within the Green Belt. However, given that the Playing Pitch</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
	<ul style="list-style-type: none"> • Additional traffic will have a negative impact on congestion on the A4260 and Bicester Road, and will affect local air quality • The PR7a site should return to 230 homes. • The proposed main modification does not represent the most appropriate strategy for development. • The proposed main modification fails under the terms of paragraph 84 of the NPPF which requires LPAs, when reviewing Green Belt boundaries, to take account of the need to promote sustainable patterns of development and the need to consider the consequences for sustainable development in their choices. • The Council's preferred approach has departed from the advice provided by the Inspector. • Reference is made to evidence on landscape, Green Belt and transport that supports the allocation of site PR6c site for residential. • Issues of the additional release of Green Belt land identified are: <ul style="list-style-type: none"> ○ the proposed southern boundary being weak or non-existent. ○ It could set a dangerous precedent for further release between Kidlington and the A34. ○ It leaves a large triangular field in which development will be difficult to resist. • An incremental approach to Green Belt harm is caused. 	<p data-bbox="1328 424 1503 488">PR-D-0069 (Bloombridge)</p> <p data-bbox="1328 820 1509 919">PR-D-0081 (Turnberry for Exeter College)</p>	<p data-bbox="1556 279 2119 451">Strategy (PPS) (PR99) indicated a need for an additional 4ha of pitches to 2031, the reduced area of 11 hectares is considered sufficient to accommodate the required pitch provision together with green infrastructure.</p> <p data-bbox="1556 496 2107 632">The site promoter submission (PR119) demonstrates that the remaining 11 hectares can accommodate 4 ha of pitch provision and green infrastructure.</p> <p data-bbox="1556 676 2119 1382">The Burley in Wharfedale decision by the Secretary of State (3208020) is noted. However, Green Belt very special circumstances (NPPF para' 87- planning applications) and exceptional circumstances (NPPF para' 82- Green Belt reviews) are respectively site and Plan specific. Further and in any event, the application of Green Belt tests is necessarily fact specific. The conclusions reached in respect of the area of Green Belt with which the Burley in Wharfedale decision was concerned cannot determine the outcome of the Green Belt exceptional circumstances test in Cherwell. The Partial Review is being examined under NPPF 2012. Exceptional circumstances were discussed extensively at the hearings, following consideration of all the evidence the Inspector reached a judgement concluding in his preliminary advice note (document PC5) that</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
			<p>exceptional circumstances exist in the individual case of the Partial Review but noted that the Council would need to demonstrate exceptional circumstances for any further changes.</p> <p>The Inspector in his Preliminary Advice Note (PC5) considers the Plan's proposed housing requirement to be sound and the strategy to be appropriate. In reaching his preliminary conclusions the Inspector considered transport matters including the potential closure of Sandy Lane.</p> <p>The MMs are supported by an Addendum to the Transport Assessment (PR 109) which concludes that, taken together, the proposed redistribution of 410 dwellings in the Council's MMs 'are expected to have a net-positive overall effect on previously assessed transport impacts.</p> <p>The Plan and its proposed MMs is supported by a schedule of infrastructure informed by the schemes and interventions sought by the relevant infrastructure provides including Oxfordshire County Council as Local Highways Authority. Infrastructure planning including identification of bus gates or other project specific measures is a continuous process which will continue through more detailed</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
			planning stages such as the preparation of site development briefs and yearly monitoring of infrastructure planning and provision.
<p>Main 20</p> <p><i>(P.64; Table 4; Policy PR7b- Land at Stratfield Farm)</i></p> <p>Replace 100 with '120'</p>	<ul style="list-style-type: none"> • Reluctantly support Main 20. • The combined effect of enlarging housing capacity on both PR7a and PR7b is to seriously restrict the delivery of much needed outdoor sports facilities. The Council's own research has confirmed there is an existing deficiency which will be exacerbated by the additional of around 550 additional homes on these two sites alone. There is a need for a significant increase in informal recreation space. • No evidence to show how delivery of new playing fields, other formal open space and sports facilities and informal space address in full the deficiencies existing and ensuing from the significant increase in the population of the immediate area. • It is essential that 2 access points are provided, reflecting the awkward shape of the site and the need to retain the setting of the centrally located Listed Buildings, their historic relationship to the orchards and the integrity of an enlarged nature conservation area. • Consider that Kidlington Parish Council should be partners in the preparation of the Development Brief for PR7b rather than Oxford City Council. • Green Belt should only be removed in exceptional circumstances. 	<p>PR-D-0080 (Kidlington PC)</p> <p>PR-D-0083 (CDWA)</p>	<p>The comments from Kidlington PC are noted.</p> <p>The Council will ensure there is consistent engagement with Parish Councils in preparing the development briefs. A change to the MMs is not required.</p> <p>The Explanatory Note (November 2019) describes in detail the process the Council took in preparing Main Modifications. A</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
	<ul style="list-style-type: none"> • The deletion of site PR10 and resultant reallocation of dwellings to the other strategic sites means the release of additional Green Belt. Alternative sites or strategies have not been properly considered. • Object to housing development in the Green Belt, the effective 'infill' of the Kidlington Gap and the loss of separation between the villages and between villages and Oxford, the loss of the North Oxford Golf Club, and the significant flaws in the Transport strategy and the closure of Sandy Lane. • The justification for removing additional Green Belt land is based on a supplementary LUC report which contradicts the original report. • There are no exceptional circumstances, endorsed by the affected communities, to justify the release of Green Belt. • The additional Oxford allocations along existing transport corridors could be extended to include sites with good rail links outside the Green Belt. • Traffic problems at Kidlington Roundabout will be worsened. • The importance of the Kidlington Gap as a separation between Oxford and Kidlington was raised at the examination but this will be all but obliterated. This is contrary to the spatial strategy in the adopted Cherwell Local Plan and the NPPF. • The Council should consider alternative sites outside the Green Belt. • Increasing housing capacity on PR7a and PR7b will reduce land available for outdoor sports facilities. 	<p>PR-D-0093 (KDW)</p> <p>PR-D-0091 (Cllr Middleton)</p>	<p>sequential consideration of options took place to avoid unnecessary further alterations to the Green Belt boundaries and to ensure that, if required, there were exceptional circumstances for further alteration. (Explanatory Note November 2019)</p> <p>The Inspector in his Preliminary Advice Note (PC5) considered that there were exceptional circumstances for development in the Green Belt but noted that the Council would need to demonstrate exceptional circumstances for any further changes. Consideration was given to whether there were options outside the Green Belt, whether there were options requiring no additional Green Belt release; and in the light of these conclusions, whether there were options within the scope of the existing strategy that would acceptably and exceptionally permit further Green Belt release. It is considered that there are exceptional circumstances justifying some further Green Belt release. All supporting information and evidence were published alongside the Main Modifications (including the consideration of alternatives in a Sustainability Appraisal Addendum) and the process detailed in the Explanatory Note November 2019.</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
	<p>Policies PR7a and PR7B should ensure delivery of sufficient new playing fields, formal and informal open space and sports facilities to meet the existing deficiencies and the needs of the new population.</p> <ul style="list-style-type: none"> • It is essential that the policy specifies that two access points are provided. Delivery of a new access to Stratfield Brake will benefit Kidlington residents and reduce traffic on the network. An additional access from Croxford Gardens will avoid the space surrounding the central Listed Buildings and Nature Conservation Area. • A pedestrian / cycle route from east to west across the site will assist in promoting non-car travel and access to public transport. • The reallocation of 20 homes from site PR10 to PR7b should be deleted. • The lack of parks and recreational facilities in Kidlington will be worsened by the additional housing and loss of Green Belt. • Site PR7b is a difficult shape, has problematic access, will add to congestion at Kidlington Roundabout. There is a need to protect the listed building setting, orchards and conservation area. The risk / benefits of delivering 20 additional houses are not warranted. • The proposed main modification does not represent the most appropriate strategy for development. • The proposed main modification fails under the terms of paragraph 84 of the NPPF which requires LPAs, when reviewing Green Belt boundaries, to take account of the need to promote sustainable patterns of development and the need to consider the 		<p>Evidence supporting the MMs including the landscape and Green Belt evidence do not contradict previous reports. In their preparation officers undertook an internal review of the plan and existing evidence base in the context of the Inspector’s advice, scoped significant changes in circumstances / new information and identified reasonable options as detailed in the Explanatory Note November 2019.</p> <p>Specifically, for PR7b, Land at Stratfield Farm, the Green Belt Study (PR40, site PR49) indicated that the release of the field immediately to the south and west of that already proposed in the Submission Plan would have the same impact on the Green Belt as the proposed submission site (approximately an additional one hectare of land). It was considered that, exceptionally, there might be scope to extend the developable area at site PR7b into this area of land (defined by a field boundary) while sufficiently accommodating the Council’s environmental objectives. Moreover, it was considered that the setting of the listed farmhouse and important trees could be protected.</p> <p>Furthermore, as a result of promoter engagement with the County Council as Local</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
	<p>consequences for sustainable development in their choices.</p> <ul style="list-style-type: none"> • The Council's preferred approach has departed from the advice provided by the Inspector. • Reference is made to evidence on landscape, Green Belt and transport that supports the allocation of PR6c site for residential. 	<p>PR-D-0081 (Turnberry for Exeter College)</p>	<p>Highways Authority, a less rigid position on the number of homes that could be accessed from the Kidlington roundabout emerged (CD PR112).</p> <p>The proposed modifications for Site PR7a will result in a reduced area being retained in the Green Belt and available for formal sports for the development and the wider community and green infrastructure within the Green Belt. However, given that the Playing Pitch Strategy (PPS) (PR99) indicated a need for an additional 4ha of pitches to 2031, the reduced area of 11 hectares is considered sufficient to accommodate the required pitch provision together with green infrastructure.</p> <p>The Inspector in his Preliminary Advice Note (PC5) considers the Plan's proposed housing requirement to be sound and the strategy to be appropriate. In reaching his preliminary conclusions the Inspector considered transport matters including the potential closure of Sandy Lane.</p> <p>The MMs are supported by an Addendum to the Transport Assessment (PR 109) which concludes that, taken together, the proposed redistribution of 410 dwellings in the Council's MMs 'are expected to have a net-positive</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
			<p>overall effect on previously assessed transport impacts.</p> <p>The Plan and its proposed MMs is supported by a schedule of infrastructure informed by the schemes and interventions sought by the relevant infrastructure providers including Oxfordshire County Council as Local Highways Authority. Infrastructure planning including identification of bus gates or other project specific measures is a continuous process which will continue through more detailed planning stages such as the preparation of site development briefs and yearly monitoring of infrastructure planning and provision.</p>
<p>Main 21</p> <p><i>(P.64; Table 4; Policy PR9 – Land West of Yarnton)</i></p> <p>Replace 530 with '<u>540</u>'</p>	<ul style="list-style-type: none"> • Green Belt should only be removed in exceptional circumstances. • The deletion of site PR10 and resultant reallocation of dwellings to the other strategic sites means the release of additional Green Belt. Alternative sites or strategies have not been properly considered. • Object to housing development in the Green Belt, the effective 'infill' of the Kidlington Gap and the loss of separation between the villages and between villages and Oxford, the loss of the North Oxford Golf Club, and the significant flaws in the Transport strategy and the closure of Sandy Lane. • The justification for removing additional Green Belt land is based on a supplementary LUC report which contradicts the original report. 	<p>PR-D-0082 (B&YGBC)</p> <p>PR-D-0083 (CDWA)</p> <p>PR-D-0091 (Cllr I Middleton)</p> <p>PR-D-0093 (KDW)</p> <p>PR-D-0056 (Yarnton PC)</p> <p>PR-D-0069 (Bloombridge)</p>	<p>The Explanatory Note (November 2019) describes in detail the process the Council took in preparing Main Modifications. A sequential consideration of options took place to avoid unnecessary further alterations to the Green Belt boundaries and to ensure that, if required, there were exceptional circumstances for further alteration.</p> <p>The Inspector in his Preliminary Advice Note (PC5) considered that there were exceptional circumstances for development in the Green Belt but noted that the Council would need to demonstrate exceptional circumstances for any further changes.</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
	<ul style="list-style-type: none"> • There are no exceptional circumstances, endorsed by the affected communities, to justify the release of Green Belt. • The additional Oxford allocations along existing transport corridors could be extended to include sites with good rail links outside the Green Belt. • Traffic problems at Kidlington Roundabout will be worsened. • The importance of the Kidlington Gap as a separation between Oxford and Kidlington was raised at the examination but this will be all but obliterated. This is contrary to the spatial strategy in the adopted Cherwell Local Plan and the NPPF. • The Council should consider alternative sites outside the Green Belt. • Extension of the current Green Belt boundary for PR9 involves encroachment onto countryside and Green Belt assessed as high harm in the LUC Cherwell Green Belt Study. It is not warranted by exceptional circumstances and contrary to the sequential approach set out in the NPPF. • The land proposed to be released from the Green Belt forms an inherently interesting historic landscape, designed by nature and traditional agricultural land use. It is an important heritage asset and is served by two major footpaths, enjoyed by both local residents and tourists. • The deletion of PR10 is supported but the evidence does not support reallocation of dwellings from PR10, a non-Green Belt site to PR9. it is unsound to remove 		<p>Consideration was given to whether there were options outside the Green Belt, whether there were options requiring no additional Green Belt release; and in the light of these conclusions, whether there were options within the scope of the existing strategy that would acceptably and exceptionally permit further Green Belt release. It is considered that there are exceptional circumstances justifying some further Green Belt release. All supporting information and evidence were published alongside the Main Modifications (including the consideration of alternatives in a Sustainability Appraisal Addendum) and the process detailed in the Explanatory Note.</p> <p>Evidence supporting the MMs including the landscape and Green Belt evidence do not contradict previous reports. In their preparation officers undertook an internal review of the plan and existing evidence base in the context of the Inspector’s advice, scoped significant changes in circumstances / new information and identified reasonable options as detailed in the Explanatory Note November 2019.</p> <p>The Inspector in his Preliminary Advice Note (PC5) considers the Plan’s proposed housing requirement to be sound and the strategy to</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
	<p>houses from a non-Green Belt site and release further Green Belt to accommodate them.</p> <ul style="list-style-type: none"> • Extension of the Green Belt boundary in PR9 will encroach on to the open and elevated countryside to the west of the A44 and will further weaken the westward boundary of the overall Review Plan area. • Extension of the PR9 boundary into land containing ridge and furrow earthworks beyond the current ancient hedgerow will damage the historic landscape setting. The extent of damage to heritage assets would remain unknown until further fieldwork is undertaken. The irretrievable release of Green Belt cannot be provisional on further research that would in fact follow the release of said Green Belt. • Further release of the Green Belt on PR9 would not accord with Local Plan Strategic Objective 15. • The extension of PR9 as proposed by Main 112 and 113 were deemed 'unacceptable' by the Council in its submission for Matter 7. The evidence now produced to reverse this judgement is unsound. • This is a missed opportunity to increase density and thereby reduce the need to release a larger area of Green Belt unnecessarily. • Object to the proposed main modification. The PR9 site should be reduced to 200 homes or deleted as an allocation. • Reference to the Landscape evidence and questioned the possibility of a defensible boundary. 		<p>be appropriate. In reaching his preliminary conclusions the Inspector considered transport matters including the potential closure of Sandy Lane.</p> <p>The MMs are supported by an Addendum to the Transport Assessment (PR 109) which concludes that, taken together, the proposed redistribution of 410 dwellings in the Council's MMs 'are expected to have a net-positive overall effect on previously assessed transport impacts'.</p> <p>The Plan and its proposed MMs is supported by a schedule of infrastructure informed by the schemes and interventions sought by the relevant infrastructure provides including Oxfordshire County Council as Local Highways Authority. Infrastructure planning including identification of bus gates or other project specific measures is a continuous process which will continue through more detailed planning stages such as the preparation of site development briefs and yearly monitoring of infrastructure planning and provision.</p> <p>Specifically, with regard to site PR9 the Inspector's preliminary findings are that <i>'there is scope for the developable area to extend westward and this might well provide the scope for a development more interesting in</i></p>

Modification Number	Comment/Issue	Representation Number	Officer Response
	<ul style="list-style-type: none"> • Reference to the Transport Assessment Addendum and its lack of justification for the site to be allocated particularly it ranked 42 out of 44 sites. • Welcomes the deletion of site PR10 however the reallocation of the dwellings across site PR9 will detrimentally impact on sites PR8 and PR9. • Sites PR8 and PR9 are not served by premium bus routes. The Transport Assessment is inaccurate in relation to bus routes. • The proposed park and ride and its associated bus services have been cited as an important element of the rapid transit bus system. However, further data on the impact of the deletion of site PR10 on its viability needs to be provided to assess the sustainability of sites PR8 and PR9. • There are inaccurate factual representations in the Transport Addendum which indicates the relocation of dwellings away from PR10 will have a positive effect upon overall levels of traffic and congestion at peak times. • The impact of relocating 410 dwellings from site PR10 to sites PR6a, PR6b, PR7a, PR7b and PR9 on the A44 and A4260 has not been assessed. Detailed modelling work needs to be undertaken to ascertain the soundness of this modification to the Plan. • The extension of the site to provide more housing at a lower density does not represent exceptional circumstances, is not justified and therefore unsound. 		<p><i>its design and layout</i> prompted the Council to consider whether additional land to the west could be allocated.</p> <p>A number of key constraints were identified and where necessary additional evidence commissioned. The key constraints included:</p> <ul style="list-style-type: none"> • High and moderate value trees including veteran trees and the presence of important hedgerows situated along field boundaries, which divide the site into smaller parcels. • The need for an appropriate design response in relation to the A44. • Surface water drainage catchments falling towards the low-lying land in the eastern part of the site and the associated land take for sustainable drainage features (SuDS). • Landform rising westwards from the A44 creating level changes to a high point north west of Begbroke. Higher ground parcels form part of the ring of hills forming a key element of Oxford's historic setting and special character. • Absence of field boundaries in the centre of the site • Historic landscape features

Modification Number	Comment/Issue	Representation Number	Officer Response
			<p>The Landscape Assessment for the site (CD PR108) concluded that the landscape could accommodate residential development on the lower slopes in the east of the study area, avoiding rising up the steeper mid-slopes, so that the enclosing function of the landform to the lower-lying broad vale would be retained. The westward extent of development should be related to the 75m AOD contour, although the strong vegetation structure to the large central field could accommodate development to about the 78m contour. A substantial green infrastructure for the development and the outer buffer of accessible green space would need to be secured through a development brief and a long-term management plan.</p> <p>The Green Belt Study Addendum (CD PR104) stated that the Submission Plan's proposed western boundary followed, for the most part, existing field boundaries. These boundaries also marked a distinction between areas closer to Yarnton, rated at moderate and moderate-high harm, and land to the west which was rated at high harm. The rising landform and absence of field boundaries in the area into which further settlement expansion is proposed are the reasons for the higher harm rating, but</p>

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			<p>some gradation can be identified. There is a distinction between the more gentle lower slopes on which development is proposed and the steeper hillside beyond, which is more clearly countryside.</p> <p>The Cherwell Green Belt Study (PR40) also noted that the higher ground formed part of the ring of hills that constitutes a key element in Oxford's historic setting, contributing to the preservation of the City's setting and special character (the 4th Green Belt purpose), but that the lower slopes were also significant in this respect.</p> <p>It continued by stating that the change in slope is not dramatic, so the precise location of a new boundary would make little difference in Green Belt terms, but a new Green Belt edge approximating to the lower end of this topography (at around the 75m contour) would nonetheless define an area in which harm to the Green Belt purposes, although greater than that associated with the formerly proposed release, would be lower than the harm associated with the release of the higher slopes.</p> <p>The Council is aware that the extended site area includes surviving ridge and furrow. However, a service trench for a pipeline has</p>

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			<p>been excavated through the field which has truncated the surviving earthworks in a 16m wide strip across the field. Furthermore, it is surrounded by modern fields and is not related to any medieval settlement. There is therefore, limited potential for the medieval development of the area to be understood from these surviving earthworks. Having regard to the above the advice of the County Archaeologist is that the features are not of such significance to warrant physical preservation.</p>
<p>Main 22 <i>(P.64; Table 4; Policy PR10 – Land South East of Woodstock)</i></p> <p>Delete Woodstock row from Table 4.</p>	<ul style="list-style-type: none"> • Agrees with the Inspector’s Post Hearing Advice note that site PR10 is too distant from Oxford which is likely to tempt residents away from more sustainable travel choices and welcome its deletion. • Welcomes the deletion of site PR10 however the reallocation of the dwellings across site PR9 will detrimentally impact on sites PR8 and PR9. • Sites PR8 and PR9 are not served by premium bus routes. The Transport Assessment is inaccurate in relation to bus routes. • The proposed park and ride and its associated bus services have been cited as an important element of the rapid transit bus system. However, further data on the impact of the deletion of site PR10 on its viability needs to be provided to assess the sustainability of sites PR8 and PR9. • There are inaccurate factual representations in the Transport Addendum which indicates the relocation of 	<p>PR-D-0083 (CDWA)</p>	<p>The comments in support of this modification are noted.</p> <p>Responses to the comments relating to the relocation of the 410 dwellings to alternative sites are set out under Main 17 – 21 above.</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
	<p> dwellings away from PR10 will have a positive effect upon overall levels of traffic and congestion at peak times.</p> <ul style="list-style-type: none"> • The impact of relocating 410 dwellings from site PR10 to sites PR6a, PR6b, PR7a, PR7b and PR9 on the A44 and A4260 has not been assessed. Detailed modelling work needs to be undertaken to ascertain the soundness of this modification to the Plan. 		
<p>Main 28</p> <p><i>(P.69; Policy PR1 - Achieving Sustainable Development for Oxford's Needs; Policy PR1)</i></p> <p>Amend to read: Cherwell District Council will work with Oxford City Council, West Oxfordshire District Council, Oxfordshire County Council, and the developers of allocated sites to deliver:</p>	<ul style="list-style-type: none"> • Land at Frieze Farm would not be able to adequately accommodate a replacement golf course to that being removed elsewhere 	PR-D-0091 (Cllr I Middleton)	This comment does not relate to the proposed modification.
<p>Main 30</p> <p><i>(P.73; Policy PR2 – Housing Mix, Tenure and Size; Policy PR2 – point 2.)</i></p> <p>Change point 2 to read: ‘...Provision of 80% of the affordable housing (as defined by</p>	<ul style="list-style-type: none"> • The proposed main modification appears vague in relation to the definition and delivery of 50% affordable housing. 	PR-D-0069 (Bloombridge)	This modification was agreed by the Council at the Local Plan Hearing. It simply adds a reference to the definition of affordable housing in the NPPF.

Modification Number	Comment/Issue	Representation Number	Officer Response
<p>the NPPF) as affordable rent/social rented dwellings and 20% as other forms on intermediate affordable homes’</p>			
<p>Main 31</p> <p><i>(P.76; Paragraph 5.38; Paragraph 5.38)</i></p> <p>The Oxford Green Belt in Cherwell presently comprises some 8409 hectares of land. Policy PR3 sets out the area of land for each strategic development site that we are removing from the Green Belt to accommodate residential and associated land uses to help meet Oxford’s unmet housing needs. In total it comprises 253 275 hectares of land – a 3 3.3% reduction. Consequently, the total area of Cherwell that comprises Green Belt falls from 14.3% to 13.98 %.</p>	<ul style="list-style-type: none"> • Green Belt should only be removed in exceptional circumstances. • The deletion of site PR10 and resultant reallocation of dwellings to the other strategic sites means the release of additional Green Belt. Alternative sites or strategies have not been properly considered. • Object to housing development in the Green Belt, the effective ‘infill’ of the Kidlington Gap and the loss of separation between the villages and between villages and Oxford, the loss of the North Oxford Golf Club, and the significant flaws in the Transport strategy and the closure of Sandy Lane. • The justification for removing additional Green Belt land is based on a supplementary LUC report which contradicts the original report. • There are no exceptional circumstances, endorsed by the affected communities, to justify the release of Green Belt. • The additional Oxford allocations along existing transport corridors could be extended to include sites with good rail links outside the Green Belt. • Traffic problems at Kidlington Roundabout will be worsened. • The importance of the Kidlington Gap as a separation between Oxford and Kidlington was raised at the 	<p>PR-D-0063 (GreenWay Oxfordshire)</p> <p>PR-D-0067 (CPRE)</p> <p>PR-D-0083 (CDWA)</p> <p>PR-D-0091 (Cllr I Middleton)</p> <p>PR-D-0093 (KDW)</p>	<p>The Explanatory Note (November 2019) describes in detail the process the Council took in preparing Main Modifications. A sequential consideration of options took place to avoid unnecessary further alterations to the Green Belt boundaries and to ensure that, if required, there were exceptional circumstances for further alteration. (Explanatory Note November 2019)</p> <p>The Inspector in his Preliminary Advice Note (PC5) considered that there were exceptional circumstances for development in the Green Belt but noted that the Council would need to demonstrate exceptional circumstances for any further changes. Consideration was given to whether there were options outside the Green Belt, whether there were options requiring no additional Green Belt release; and in the light of these conclusions, whether there were options within the scope of the existing strategy that would acceptably and exceptionally permit further Green Belt release. It is considered that there are exceptional circumstances justifying some further Green Belt release. All supporting</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
	<p>examination but this will be all but obliterated. This is contrary to the spatial strategy in the adopted Cherwell Local Plan and the NPPF.</p> <ul style="list-style-type: none"> • The Council should consider alternative sites outside the Green Belt. • Contrary to NPPF. • The Partial Review Strategy now puts all the housing in the Oxford Green Belt. • The Kidlington Gap is further eroded. • There is considerable scope for increasing densities and thus removing some of the allocations. For example, PR6b. • The proposed area of Green Belt land being considered represents a far more significant area at a local level. • Expansion of Begbroke Science Park should be subject to separate and specific local consultations rather than being within plans intended to deal with Oxford's unmet housing need. • Opposed to the allocation of Green Belt to meet Oxford's unmet need. However, if Green Belt is to be developed, it is vital that it is used as efficiently as possible. • The modification increases the land take to 275 hectares, comprising of all Green Belt land. Averaged across this area, the 4,400 houses would be built at a density of 16 dph. • A significant reduction in the amount of land required can be accommodated by increasing the housing density on sites, bringing the density more in line with local and national plans and policies. 		<p>information and evidence were published alongside the Main Modifications (including the consideration of alternatives in a Sustainability Appraisal Addendum) and the process detailed in the Explanatory Note.</p> <p>Evidence supporting the MMs including the landscape and Green Belt evidence do not contradict previous reports. In their preparation officers undertook an internal review of the plan and existing evidence base in the context of the Inspector's advice, scoped significant changes in circumstances / new information and identified reasonable options as detailed in the Explanatory Note November 2019.</p> <p>The Inspector in his Preliminary Advice Note (PC5) considers the Plan's proposed housing requirement to be sound and the strategy to be appropriate.</p> <p>The existing adopted Cherwell Local Plan (2015) explains the important economic role of the Begbroke Science Park. It describes its potential for further growth to support the provision of land for high-technology university spin-outs to help develop a high value economic base. Policy Kidlington 1 states that the Council will undertake a small-scale review of the Green Belt to</p>

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	<ul style="list-style-type: none"> The benefits of high density include lower house prices, lower emissions, and greater social cohesion. 		<p>accommodate identified high value employment needs including at Begbroke Science Park.</p> <p>The Inspector addressed the issue of density in his preliminary advice note (PC5). He stated that overall <i>'the Council has struck a broadly sensible balance between the extent of the land proposed to be removed from the Green Belt, and the need to accommodate development that respects its context. I see nothing unsound in that approach.'</i></p>
<p>Main 32</p> <p><i>(P.77; Paragraph 5.39; PR3(e))</i></p> <p>Amend penultimate sentence to read, 'The potential extension of the Science Park, <u>provided for by Policy Kidlington 1 of the Local Plan</u>, will be considered further in Local Plan Part 2...'</p>	<ul style="list-style-type: none"> The proposed main modification is supported although not essential for soundness. Green Belt should only be removed in exceptional circumstances. The importance of the Kidlington Gap as a separation between Oxford and Kidlington was raised at the examination but this will be all but obliterated. This is contrary to the spatial strategy in the adopted Cherwell Local Plan and the NPPF. The Council should consider alternative sites outside the Green Belt. The deletion of site PR10 and resultant reallocation of dwellings to the other strategic sites means the release of additional Green Belt. Alternative sites or strategies have not been properly considered. 	<p>PR-D-0057 (David Lock Assoc for the PR8 Parties)</p> <p>PR-D-0083 (CDWA)</p> <p>PR-D-0093 (KDW)</p> <p>PR-D-0091 (Cllr Middleton)</p>	<p>Noted</p> <p>The responses raising objections do not specifically relate to this modification.</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
	<ul style="list-style-type: none"> • Object to housing development in the Green Belt, the effective ‘infill’ of the Kidlington Gap and the loss of separation between the villages and between villages and Oxford, the loss of the North Oxford Golf Club, and the significant flaws in the Transport strategy and the closure of Sandy Lane. • The justification for removing additional Green Belt land is based on a supplementary LUC report which contradicts the original report. • There are no exceptional circumstances, endorsed by the affected communities, to justify the release of Green Belt. • The additional Oxford allocations along existing transport corridors could be extended to include sites with good rail links outside the Green Belt. • Traffic problems at Kidlington Roundabout will be worsened. • Any expansion of Begbroke Science Park should be subject to separate and specific local consultations. 		
<p>Main 33</p> <p><i>(P.77; Policy PR3: The Oxford Green Belt; Policy PR7a)</i></p> <p>Amend the sentence to read: Policy PR7a – removal of 10.8 21 hectares of land as shown on inset Policies Map PR7a</p>	<ul style="list-style-type: none"> • Supports proposed modification. • Green Belt should only be removed in exceptional circumstances. • The deletion of site PR10 and resultant reallocation of dwellings to the other strategic sites means the release of additional Green Belt. Alternative sites or strategies have not been properly considered. 	<p>PR-D-0014 Pegasus for Barwood Developments)</p> <p>PR-D-0083 (CDWA)</p> <p>PR-D-0091 (Cllr I Middleton)</p> <p>PR-D-0092 (Wolvercote</p>	<p>Noted</p> <p>This change is a consequence of the substantive modification at MM 19 and these representations raise similar issues to those made in response to that modification.</p> <p>Reference should therefore be made to the full response under MM 19.</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
	<ul style="list-style-type: none"> • Object to housing development in the Green Belt, the effective 'infill' of the Kidlington Gap and the loss of separation between the villages and between villages and Oxford, the loss of the North Oxford Golf Club, and the significant flaws in the Transport strategy and the closure of Sandy Lane. • The justification for removing additional Green Belt land is based on a supplementary LUC report which contradicts the original report. • There are no exceptional circumstances, endorsed by the affected communities, to justify the release of Green Belt. • The additional Oxford allocations along existing transport corridors could be extended to include sites with good rail links outside the Green Belt. • Traffic problems at Kidlington Roundabout will be worsened. • The importance of the Kidlington Gap as a separation between Oxford and Kidlington was raised at the examination but this will be all but obliterated. This is contrary to the spatial strategy in the adopted Cherwell Local Plan and the NPPF. • The Council should consider alternative sites outside the Green Belt. • Doubling of the land take on the site is given little acknowledgement aside from this brief note. • The significant increase in the land take is not properly justified. • The NPPF stipulates that removal of land from the Green Belt requires a case to be made for exceptional 	<p>Neighbourhood Forum) PR-D-0093 (KDW)</p>	

Modification Number	Comment/Issue	Representation Number	Officer Response
	<p>circumstances. This change at PR7a involves an area of high harm and no specific case has been made for the removal of this land from the Green Belt other than the need to find a site for some of the additional houses needed to compensate for the deletion of the site at PR10. This disturbs the environmental balance as PR10 is not in the Green Belt.</p> <ul style="list-style-type: none"> • The release of more Green Belt land should be delayed until the accuracy of the 2014 SHMA figures, currently questioned by the OLP inspectors, has been resolved. • Object to the proposed main modification due to the high harm caused to the Green Belt in the area including the Kidlington Gap. • The PR7a site should return to 230 homes. • The proposed main modification does not represent the most appropriate strategy for development. • The proposed main modification fails under the terms of paragraph 84 of the NPPF which requires LPAs, when reviewing Green Belt boundaries, to take account of the need to promote sustainable patterns of development and the need to consider the consequences for sustainable development in their choices. • The Council's preferred approach has departed from the advice provided by the Inspector. • Reference made to evidence on landscape, Green Belt and transport that supports the allocation of PR6c site for residential. 	<p>PR-D-0069 (Bloombridge)</p> <p>PR-D-0081 (Turnberry for Exeter College)</p>	

Modification Number	Comment/Issue	Representation Number	Officer Response
	<ul style="list-style-type: none"> • Issues of the additional release of Green Belt land identified are: <ul style="list-style-type: none"> ○ the proposed southern boundary being weak or non-existent. ○ It could set a dangerous precedent for further release between Kidlington and the A34. ○ It leaves a large triangular field in which development will be difficult to resist. • An incremental approach to Green Belt harm is caused. 		
<p>Main 34</p> <p><i>(P.77; Policy PR3: The Oxford Green Belt; Policy PR7b)</i></p> <p>Amend sentence to read: Policy PR7b – removal of 4.3 <u>5</u> hectares of land as shown on inset Policies Map PR7b</p>	<ul style="list-style-type: none"> • The proposed main modification does not represent the most appropriate strategy for development. • The proposed main modification fails under the terms of paragraph 84 of the NPPF which requires LPAs, when reviewing Green Belt boundaries, to take account of the need to promote sustainable patterns of development and the need to consider the consequences for sustainable development in their choices. • The Council’s preferred approach has departed from the advice provided by the Inspector. • References to the respondent’s evidence on landscape, Green Belt and transport that supports the PR6c site for residential. • The NPPF stipulates that removal of land from the Green Belt requires a case to be made for exceptional circumstances. The removal of land from the Green Belt at PR7a involves an area of moderate harm and no specific case has been made for the removal of land here other than the need to find a site for some of the additional houses needed to compensate for the 	<p>PR-D-0081 (Turnberry for Exeter College)</p> <p>PR-D-0083 (CDWA)</p> <p>PR-D-0092 (Wolvercote Neighbourhood Forum)</p> <p>PR-D-0093 (KDW)</p>	<p>This change is a consequence of the substantive modification at MM 20 and these representations raise similar issues to those made in response to that modification.</p> <p>Reference should therefore be made to the full response under MM 20.</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
	<p>deletion of the site at PR10. This disturbs the environmental balance as PR10 is not in the Green Belt.</p> <ul style="list-style-type: none"> • The release of more Green Belt land should be delayed until the accuracy of the 2014 SHMA figures, currently questioned by the OLP inspectors, has been resolved. • Green belt should only be removed in exceptional circumstances. • The importance of the Kidlington Gap as a separation between Oxford and Kidlington was raised at the examination but this will be all but obliterated. This is contrary to the spatial strategy in the adopted Cherwell Local Plan and the NPPF. • The Council should consider alternative sites outside the Green Belt. • The deletion of site PR10 and resultant reallocation of dwellings to the other strategic sites means the release of additional Green Belt. Alternative sites or strategies have not been properly considered. • Object to housing development in the Green Belt, the effective 'infill' of the Kidlington Gap and the loss of separation between the villages and between villages and Oxford, the loss of the North Oxford Golf Club, and the significant flaws in the Transport strategy and the closure of Sandy Lane. • The justification for removing additional Green Belt land is based on a supplementary LUC report which contradicts the original report. • There are no exceptional circumstances, endorsed by the affected communities, to justify the release of Green Belt. 		

Modification Number	Comment/Issue	Representation Number	Officer Response
	<ul style="list-style-type: none"> The additional Oxford allocations along existing transport corridors could be extended to include sites with good rail links outside the Green Belt. Traffic problems at Kidlington Roundabout will be worsened. 		
<p>Main 35</p> <p><i>(P.77; Policy PR3: The Oxford Green Belt; Policy PR9)</i></p> <p>Amend sentence to read: Policy PR9 – removal of 17.7 <u>27</u> hectares of land as shown on inset Policies Map PR9</p>	<ul style="list-style-type: none"> Extension of the current Green Belt boundary for PR9 involves encroachment onto countryside and Green Belt assessed as high harm in the LUC Cherwell Green Belt Study. It is not warranted by exceptional circumstances and contrary to the sequential approach set out in the NPPF The land proposed to be released from the Green Belt forms an inherently interesting historic landscape, designed by nature and traditional agricultural land use. It is an important heritage asset and is served by two major footpaths, enjoyed by both local residents and tourists The deletion of PR10 is supported but the evidence does not support reallocation of dwellings from PR10, a non-Green Belt site to PR9. it is unsound to remove houses from a non-Green Belt site and release further Green Belt to accommodate them Extension of the Green Belt boundary in PR9 will encroach on to the open and elevated countryside to the west of the A44 and will further weaken the westward boundary of the overall Review Plan area Extension of the PR9 boundary into land containing ridge and furrow earthworks beyond the current ancient hedgerow will damage the historic landscape setting. The extent of damage to heritage assets would 	<p>PR-D-0082 (B&YGBC) PR-D-0083 (CDWA) PR-D-0093 (KDW) PR-D-0091 (Cllr Middleton)</p>	<p>This change is a consequence of the substantive modification at MM 21 and these representations raise similar issues to those made in response to that modification.</p> <p>Reference should therefore be made to the full response under MM 21.</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
	<p>remain unknown until further fieldwork is undertaken. The irretrievable release of Green Belt cannot be provisional on further research that would in fact follow the release of Green Belt</p> <ul style="list-style-type: none"> • Further release of the Green Belt on PR9 would not accord with Local Plan Strategic Objective 15 • The extension of PR9 as proposed by Main 112 and 113 were deemed 'unacceptable' by the Council in its submission for Matter 7. The evidence now produced to reverse this judgement is unsound • Green Belt should only be removed in exceptional circumstances. • The importance of the Kidlington Gap as a separation between Oxford and Kidlington was raised at the examination but this will be all but obliterated. This is contrary to the spatial strategy in the adopted Cherwell Local Plan and the NPPF. • The Council should consider alternative sites outside the Green Belt. • The deletion of site PR10 and resultant reallocation of dwellings to the other strategic sites means the release of additional Green Belt. Alternative sites or strategies have not been properly considered. • Object to housing development in the Green Belt, the effective 'infill' of the Kidlington Gap and the loss of separation between the villages and between villages and Oxford, the loss of the North Oxford Golf Club, and the significant flaws in the Transport strategy and the closure of Sandy Lane. 		

Modification Number	Comment/Issue	Representation Number	Officer Response
	<ul style="list-style-type: none"> • The justification for removing additional Green Belt land is based on a supplementary LUC report which contradicts the original report. • There are no exceptional circumstances, endorsed by the affected communities, to justify the release of Green Belt. • The additional Oxford allocations along existing transport corridors could be extended to include sites with good rail links outside the Green Belt. • Traffic problems at Kidlington Roundabout will be worsened. • The land take is being increased by more than a third. This significant increase in the land take has not been properly justified beyond the expediency of having to replace land previously accolated in Woodstock. 		
<p>Main 37</p> <p><i>(P.82; Policy PR4a: Sustainable Transport; Policy PR4a: Sustainable Transport)</i></p> <p>Amend to read: The strategic developments provided for under Policies PR6 to PR910 will be expected to provide proportionate financial contributions directly related to the development in order to secure necessary improvements to, and mitigations for, the highway network and to deliver</p>	<ul style="list-style-type: none"> • Financial contributions not detailed yet will have a material impact on the effectiveness of the Plan. Costings for the Sustainable Transport Plan are estimated where the current funding is known to fall short of the need. The scale of the shortfall to be met by developers is unknown. It is likely that the affordable housing quantum will be reduced as a result. • A more complete and detailed costing is required for the Sustainable Transport Plan so that the scale of funding required can be more accurately obtained with greater clarity on the contributions required from developers. • The Plan fails to meet the objectively assessed development and infrastructure requirements, 	<p>PR-D-0039 (A Applegarth) PR-D-0091 (Cllr I Middleton)</p>	<p>This is a consequential referencing modification caused by the deletion of PR10.</p> <p>These representations do not address this modification.</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
<p>necessary improvements to infrastructure and services for public transport.</p>	<p>including unmet requirements from neighbouring authorities. The unmet need, based on the 2014 SHMA, has not been substantiated, has been questioned by the Oxford City Plan Inspector and I therefore not justified.</p> <ul style="list-style-type: none"> • A formal costing which confirms the actual affordable housing to be provided is required to justify the exceptional circumstance of development on the Green Belt, as required by the NPPF. • A portion of the housing earmarked for PR8 and PR9 is to meet the growth requirement of Merton College which appears a commercial venture for the University of Oxford. • The proposed modification lacks detail as to what additional mitigations will be required. 		
<p>Main 38 <i>(P.85; Para 5.67; Point 5)</i></p> <p>Amend sub-point v. to read 'creating high- quality built and natural environments <u>that can be sustained in the long term, and</u></p> <p>Re-number sub-point vi. as sub-point vii.</p> <p>Add new sub-point vi. '<u>the construction of sustainable urban drainage systems</u>'</p>	<ul style="list-style-type: none"> • Anglian Water Services Limited supports new sub-point vi "the construction of sustainable urban drainage systems". • Supports modification. • Green Belt should only be removed in exceptional circumstances. • The importance of the Kidlington Gap as a separation between Oxford and Kidlington was raised at the examination but this will be all but obliterated. This is contrary to the spatial strategy in the adopted Cherwell Local Plan and the NPPF. 	<p>PR-D-0008 (Anglian Water)</p> <p>PR-D-0085 (Oxfordshire CC)</p> <p>PR-D-0083 (CDWA) PR-D-0093 (KDW)</p>	<p>Noted</p> <p>Noted</p> <p>The issues raised in these representations do not relate to this modification.</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
	<ul style="list-style-type: none"> • The Council should consider alternative sites outside the Green Belt. • The deletion of site PR10 and resultant reallocation of dwellings to the other strategic sites means the release of additional Green Belt. Alternative sites or strategies have not been properly considered. • Object to housing development in the Green Belt, the effective 'infill' of the Kidlington Gap and the loss of separation between the villages and between villages and Oxford, the loss of the North Oxford Golf Club, and the significant flaws in the Transport strategy and the closure of Sandy Lane. • The justification for removing additional Green Belt land is based on a supplementary LUC report which contradicts the original report. • There are no exceptional circumstances, endorsed by the affected communities, to justify the release of Green Belt. • The additional Oxford allocations along existing transport corridors could be extended to include sites with good rail links outside the Green Belt. • Traffic problems at Kidlington Roundabout will be worsened. 		
<p>Main 39</p> <p><i>(P.86; Para 5.69; New Point)</i></p> <p>Add new point 11 to read 'enhance health and well-being'</p>	<ul style="list-style-type: none"> • Supports modification • Green Belt should only be removed in exceptional circumstances. • The importance of the Kidlington Gap as a separation between Oxford and Kidlington was raised at the 	<p>PR-D-0085 (Oxfordshire CC)</p> <p>PR-D-0083 (CDWA)</p> <p>PR-D-0093 (KDW)</p>	<p>Noted</p> <p>The issues raised in these representations do not relate to this modification.</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
	<p>examination but this will be all but obliterated. This is contrary to the spatial strategy in the adopted Cherwell Local Plan and the NPPF.</p> <ul style="list-style-type: none"> • The Council should consider alternative sites outside the Green Belt. • The deletion of site PR10 and resultant reallocation of dwellings to the other strategic sites means the release of additional Green Belt. Alternative sites or strategies have not been properly considered. • Object to housing development in the Green Belt, the effective 'infill' of the Kidlington Gap and the loss of separation between the villages and between villages and Oxford, the loss of the North Oxford Golf Club, and the significant flaws in the Transport strategy and the closure of Sandy Lane. • The justification for removing additional Green Belt land is based on a supplementary LUC report which contradicts the original report. • There are no exceptional circumstances, endorsed by the affected communities, to justify the release of Green Belt. • The additional Oxford allocations along existing transport corridors could be extended to include sites with good rail links outside the Green Belt. • Traffic problems at Kidlington Roundabout will be worsened. 		
<p>Main 41 <i>(P.86; Policy PR5: Green Infrastructure; Point (1))</i></p>	<ul style="list-style-type: none"> • Green Belt should only be removed in exceptional circumstances. • The importance of the Kidlington Gap as a separation between Oxford and Kidlington was raised at the 	<p>PR-D-0083 (CDWA) PR-D-0093 (KDW)</p>	<p>The issues raised in these representations do not relate to this modification.</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
<p>Amend to read, 'Applications will be expected to: (1) Identify existing GI and its connectivity and demonstrate how this will, as far as possible, be protected and incorporated into the layout, design and appearance of the proposed development'</p>	<p>examination but this will be all but obliterated. This is contrary to the spatial strategy in the adopted Cherwell Local Plan and the NPPF.</p> <ul style="list-style-type: none"> • The Council should consider alternative sites outside the Green Belt. • The deletion of site PR10 and resultant reallocation of dwellings to the other strategic sites means the release of additional Green Belt. Alternative sites or strategies have not been properly considered. • Object to housing development in the Green Belt, the effective 'infill' of the Kidlington Gap and the loss of separation between the villages and between villages and Oxford, the loss of the North Oxford Golf Club, and the significant flaws in the Transport strategy and the closure of Sandy Lane. • The justification for removing additional Green Belt land is based on a supplementary LUC report which contradicts the original report. • There are no exceptional circumstances, endorsed by the affected communities, to justify the release of Green Belt. • The additional Oxford allocations along existing transport corridors could be extended to include sites with good rail links outside the Green Belt. • Traffic problems at Kidlington Roundabout will be worsened. 		
<p>Main 42</p> <p><i>(P.86; Policy PR5: Green Infrastructure; Point (8))</i></p>	<ul style="list-style-type: none"> • Supports modification. 	<p>PR-D-0085 (Oxfordshire CC)</p>	<p>Noted</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
<p>Amend to read 'Demonstrate where multi-functioning GI can be achieved, <u>including helping to address climate change impacts and taking into account best practice guidance.</u>'</p>	<ul style="list-style-type: none"> • The deletion of site PR10 and resultant reallocation of dwellings to the other strategic sites means the release of additional Green Belt. Alternative sites or strategies have not been properly considered. • Object to housing development in the Green Belt, the effective 'infill' of the Kidlington Gap and the loss of separation between the villages and between villages and Oxford, the loss of the North Oxford Golf Club, and the significant flaws in the Transport strategy and the closure of Sandy Lane. • The justification for removing additional Green Belt land is based on a supplementary LUC report which contradicts the original report. • There are no exceptional circumstances, endorsed by the affected communities, to justify the release of Green Belt. • The additional Oxford allocations along existing transport corridors could be extended to include sites with good rail links outside the Green Belt. • Traffic problems at Kidlington Roundabout will be worsened. • In view of the Council's climate change emergency motion, the Plan should be reassessed in view of the harm to green spaces, additional emissions, increased populations and increased traffic congestion. • Green Belt should only be removed in exceptional circumstances. • The importance of the Kidlington Gap as a separation between Oxford and Kidlington was raised at the examination but this will be all but obliterated. This is 	<p>PR-D-0083 (CDWA) PR-D-0091 (Cllr I Middleton) PR-D-0093 (KDW) PR-D-0056 (Yarnton Parish Council)</p>	<p>The issues raised in these representations do not relate to this modification.</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
	<p>contrary to the spatial strategy in the adopted Cherwell Local Plan and the NPPF.</p> <ul style="list-style-type: none"> • The Council should consider alternative sites outside the Green Belt. • The proposed modification alone is inadequate as it should be included in every aspect of the Plan and not just the Green Infrastructure. The buildings themselves and their connecting highways and route ways need to be included. • Yarnton Parish Council has passed a Climate Emergency Resolution and will expect every aspect of these developments to match the aims of its Resolution, as of Cherwell District Council's own Climate Emergency resolution. Needs to be more positively prepared. 		
<p>Main 43</p> <p><i>(P.86; Policy PR5: Green Infrastructure; Point (9))</i></p> <p>Amend to read: 'Provide details of how GI will be maintained and managed <u>in the long term.</u>'</p>	<ul style="list-style-type: none"> • Supports modification. • Green Belt should only be removed in exceptional circumstances. • The importance of the Kidlington Gap as a separation between Oxford and Kidlington was raised at the examination but this will be all but obliterated. This is contrary to the spatial strategy in the adopted Cherwell Local Plan and the NPPF. • The Council should consider alternative sites outside the Green Belt. • The deletion of site PR10 and resultant reallocation of dwellings to the other strategic sites means the release 	<p>PR-D-0085 (Oxfordshire CC)</p> <p>PR-D-0083 (CDWA)</p> <p>PR-D-0093 (KDW)</p>	<p>Noted</p> <p>The issues raised in these representations do not relate to this modification.</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
	<p>of additional Green Belt. Alternative sites or strategies have not been properly considered.</p> <ul style="list-style-type: none"> • Object to housing development in the Green Belt, the effective 'infill' of the Kidlington Gap and the loss of separation between the villages and between villages and Oxford, the loss of the North Oxford Golf Club, and the significant flaws in the Transport strategy and the closure of Sandy Lane. • The justification for removing additional Green Belt land is based on a supplementary LUC report which contradicts the original report. • There are no exceptional circumstances, endorsed by the affected communities, to justify the release of Green Belt • The additional Oxford allocations along existing transport corridors could be extended to include sites with good rail links outside the Green Belt. • Traffic problems at Kidlington Roundabout will be worsened. 		
<p>Main 44</p> <p><i>(P.88; Para 5.85; 2nd sentence)</i></p> <p>Amend to read' ...It will be necessary to have regard to adopted Development Plan policies for design and the built environment for both Cherwell and Oxford, to the emerging Cherwell Design Guide Supplementary Planning</p>	<ul style="list-style-type: none"> • Supports modification. 	<p>PR-D-0085 (Oxfordshire CC)</p>	<p>Noted</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
<p>Document (SPD), and to Oxford City Council's SPD - High Quality Design in Oxford - Respecting Heritage and Achieving Local Distinctiveness, <u>and Oxfordshire County Council's Cycling and Walking Design Guides...</u>'</p>			
<p>Main 45</p> <p><i>(P.89; Policy PR6a – Land East of Oxford Road - Policies Map; Land East of Oxford Road)</i></p> <p>Reduce land allocation for primary school use from 3.2 hectares to 2.2 hectares. Allocate 1 hectare to residential use.</p>	<ul style="list-style-type: none"> The proposed main modification is supported. Reducing the land allocated to the school by nearly a third is not justified. 	<p>PR-D-0010 (North Oxford Consortium) PR-D-0085 (Oxfordshire CC)</p> <p>PR-D-0091 (Cllr I Middleton)</p>	<p>Noted</p> <p>The reduction in the land allocated for the school followed advice from Oxfordshire CC, as education authority. Their representation confirms their support for this modification.</p>
<p>Main 46</p> <p><i>(P.90; Policy PR6a – Land East of Oxford Road; Point 1)</i></p> <p>Amend to read 'Construction of 690 650 dwellings (net) on approximately 25 24 hectares of land (the residential area as shown). The dwellings are to be constructed at an approximate</p>	<ul style="list-style-type: none"> The proposed main modification is supported. Opposed to the allocation of Green Belt to meet Oxford's unmet need. However, if Green Belt is to be developed, it is vital that it is used as efficiently as possible. The modification increases the land take to 275 hectares, comprising of all Green Belt land. Averaged 	<p>PR-D-0010 (North Oxford Consortium)</p> <p>PR-D-0067 (CPRE)</p>	<p>Noted</p> <p>The Inspector addressed the issue of density in his preliminary advice note (PC5). He stated that overall '<i>the Council has struck a broadly sensible balance between the extent of the land proposed to be removed from the Green Belt, and the need to accommodate</i></p>

Modification Number	Comment/Issue	Representation Number	Officer Response
average net density of 40 dwellings per hectare'	<p>across this area, the 4,400 houses would be built at a density of 16 dph.</p> <ul style="list-style-type: none"> A significant reduction in the amount of land required can be accommodated by increasing the housing density on sites, bringing the density more in line with local and national plans and policies. The benefits of high density include lower house prices, lower emissions, and greater social cohesion. 		<i>development that respects its context. I see nothing unsound in that approach.'</i>
<p>Main 47</p> <p><i>(P.90; Policy PR6a – Land East of Oxford Road; Point 3)</i></p> <p>Amend to read 'The provision of a primary school with at least three two forms of entry on 32.2 hectares of land in the location shown'</p>	<ul style="list-style-type: none"> The proposed main modification is supported. Important infrastructure improvements are being eroded by the proposed modification. 	<p>PR-D-0010 (North Oxford Consortium) PR-D-0085 (Oxfordshire CC)</p> <p>PR-D-0091 (Cllr I Middleton)</p>	<p>Noted</p> <p>The modification has been proposed in response to the requirements of Oxfordshire CC, as Education authority.</p>
<p>Main 48</p> <p><i>(P.90; Policy PR6a– Land East of Oxford Road; Point 7)</i></p> <p>Amend first sentence to read, '...pedestrian, wheelchair and all-weather cycle route along the site's eastern boundary within the area of green space as shown on the policies map.'</p>	<ul style="list-style-type: none"> The proposed main modification is supported. The proposed modification represents a reduction in accessibility 	<p>PR-D-0010 North Oxford Consortium)</p> <p>PR-D-0091 (Cllr I Middleton)</p>	<p>Noted</p> <p>Officer's disagree that this modification represents a reduction in accessibility. The modification introduces consistency with other policies in the Plan.</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
<p>Main 49</p> <p><i>(P.91; Policy PR6a - Land East of Oxford Road; Policy PR6a – point 10 (a))</i></p> <p>Add a second sentence to point 10 (a) to read: <u>‘Minor variations in the location of specific uses will be considered where evidence is available.’</u></p>	<ul style="list-style-type: none"> The proposed main modification is supported. The proposed main modification is supported if the word ‘minor’ is deleted. Appears to give a huge amount of unspecified latitude. 	<p>PR-D-0010 (North Oxford Consortium)</p> <p>PR-D-0085 (Oxfordshire CC)</p> <p>PR-D-0091 (Cllr I Middleton)</p>	<p>Noted</p> <p>Officer’s do not agree that the word ‘minor’ should be deleted.</p> <p>This modification refers to ‘minor’ variations in the location of specific uses. This amendment was agreed by the Council at the Local Plan Hearing.</p>
<p>Main 50</p> <p><i>(P.91; Policy PR6a – Land East of Oxford Road; Point 10 (b))</i></p> <p>Amend to read ‘Two pPoints of vehicular access and egress from and to existing highways, primarily from Oxford Road’</p>	<ul style="list-style-type: none"> Modification supported due to the size of the development. Suggests deleting ‘existing highways, primarily from’ as this is superfluous. The proposed main modification should be deleted as this limits flexibility at the Development Brief stage. Suggests deleting ‘primarily’ It is understood that the Highway authority would require two points of access but are surprised that the landowners’ illustrative plans seem to show two accesses to the Oxford Road fairly close together. An access point off the P&R junction would be better for managing increased traffic flows and would be less disruptive to cyclists and pedestrians. 	<p>PR-D-0085 (Oxfordshire CC)</p> <p>PR-D-0010 (North Oxford Consortium)</p> <p>PR-D-0063 (GreenWay Oxfordshire)</p>	<p>Noted</p> <p>Whilst officer’s do not object to the deletion of ‘primarily’ as requested by Oxfordshire CC and GreenWay, in principle, it is not considered that the change is necessary for soundness.</p> <p>This modification was made at the request of Oxfordshire CC, as Highway Authority. Officers do not agree that the modifications should be deleted.</p> <p>The detailed comments raised by GreenWay Oxfordshire do not relate specifically to this modification. They are issues more appropriately addressed through the development brief.</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
<p>Main 51</p> <p><i>(P.91; Policy PR6a – Land East of Oxford Road; Point 10 (c))</i></p> <p>Amend to read 'An outline scheme for public vehicular, cycle, pedestrian and wheelchair connectivity within the site, to the built environment of Oxford, to Cutteslowe Park, to the allocated site to the west of Oxford Road (policy PR6b) enabling connection to Oxford City Council's allocated 'Northern Gateway' site, to Oxford Parkway and Water Eaton Park and Ride, and to existing or new points of connection off-site and to existing or potential public transport services. <u>Required access to existing property via the site should be maintained.</u>'</p>	<ul style="list-style-type: none"> The proposed main modification is supported. 	PR-D-0010 (North Oxford Consortium)	Noted
<p>Main 52</p> <p><i>(P.92; Policy PR6a– Land East of Oxford Road; Point 13)</i></p>	<ul style="list-style-type: none"> The proposed main modification is supported. 	PR-D-0010 (North Oxford Consortium)	Noted

Modification Number	Comment/Issue	Representation Number	Officer Response
<p>Amend to read 'The application(s) shall be supported by a phase 1 habitat survey including habitat suitability index (HSI) survey for great crested newts, and protected and notable species surveys as appropriate, including for great crested newt presence/absence surveys (dependent on HSI survey), surveys for badgers, breeding birds and reptiles, an internal building assessment for roosting barn owl, a tree survey and an assessment of the watercourse that forms the south-eastern boundary of the site and Hedgerow Regulations Assessment''</p>			
<p>Main 53</p> <p><i>(P.92; Policy PR6a– Land East of Oxford Road; Point 15)</i></p> <p>Amend to read 'The application shall be supported by a Heritage Impact Assessment which will include identify measures to avoid or minimise conflict with the identified heritage assets</p>	<ul style="list-style-type: none"> The proposed main modification is supported. 	<p>PR-D-0010 (North Oxford Consortium)</p>	<p>Noted</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
<p>within the site, particularly the Grade 2* Listed St Frideswide Farmhouse. <u>These measures shall be incorporated or reflected, as appropriate, in any proposed development scheme.</u></p>			
<p>Main 54 <i>(P.92; Policy PR6a– Land East of Oxford Road; Point 17)</i></p> <p>Amend to read 'The application should demonstrate that Thames Water has agreed in principle <u>and the Environment Agency have been consulted regarding wastewater treatment capacity and agreement has been reached</u> in principle that foul drainage from the site will be accepted into <u>the drainage its</u> network.'</p>	<ul style="list-style-type: none"> • The treatment of effluent and references to the Environment Agency are not required and should be deleted. • Requests that the proposed wording of Policy PR6a Point 17 is amended to read: "...in principle that foul drainage from the site will be accepted into the foul drainage network." 	<p>PR-D-0010 (North Oxford Consortium)</p> <p>PR-D-0034 (Thames Water)</p>	<p>This modification has been made following representations from Natural England and recommendations from the Water Cycle Study.</p> <p>Whilst officer's do not object to the amended wording, in principle, it is not considered that the change is necessary for soundness.</p>
<p>Main 55 <i>(P.93; Policy PR6a– Land East of Oxford Road; Point 18)</i></p>	<ul style="list-style-type: none"> • The proposed main modification is supported. 	<p>PR-D-0010 (North Oxford Consortium)</p>	<p>Noted</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
<p>Amend to read'...mitigation measures. <u>The outcomes of the investigation and mitigation measures shall be incorporated or reflected, as appropriate, in any proposed development scheme.</u></p>			
<p>Main 56</p> <p>(P.93; Policy PR6a– Land East of Oxford Road; New Point) Add new point 20 to read '<u>The application shall include a management plan for the appropriate re-use and improvement of soils</u>'</p> <p>Re-number subsequent points</p>	<ul style="list-style-type: none"> • Reference to a soils management plan is unnecessary and should be deleted as this can be addressed at the Development Brief or planning application stage. • Supports modification. 	<p>PR-D-0010 (North Oxford Consortium)</p> <p>PR-D-0085 (Oxfordshire CC)</p>	<p>Officers do not agree that this modification should be deleted. It reflects Government advice, including the NPPF.</p> <p>Noted</p>
<p>Main 57</p> <p><i>(P.93; Policy PR6a - Land East of Oxford Road; Policy PR6a – point 21.)</i></p> <p>Amend the final sentence to read:</p>	<ul style="list-style-type: none"> • The proposed main modification is supported. 	<p>PR-D-0010 (North Oxford Consortium)</p>	<p>Noted</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
<p>'The Delivery Plan shall include a start date for development, demonstration of how the development would be completed by 2031 and a programme showing how the site will contribute towards maintaining a five year supply of housing. (for the site) will be maintained year on year.'</p>			
<p>Main 58</p> <p><i>(P.94; Policy PR6a– Land East of Oxford Road; Point 28)</i></p> <p>Amend to read 'The location of archaeological features, including the tumuli to the east of the Oxford Road, should be incorporated and made evident in the landscape design of the site.'</p>	<ul style="list-style-type: none"> The proposed main modification is supported. 	<p>PR-D-0010 (North Oxford Consortium)</p>	<p>Noted</p>
<p>Main 59</p> <p><i>(P.96; Policy PR6b - Land West of Oxford Road; Point 1)</i></p>	<ul style="list-style-type: none"> The proposed main modification is supported. 	<p>PR-D-0010 (North Oxford Consortium)</p>	<p>Noted</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
<p>Amend to read: 'Construction of 670 530 dwellings (net) on 32 hectares of land (the residential area as shown). The dwellings are to be constructed at an approximate average net density of 25 dwellings per hectare.'</p>	<ul style="list-style-type: none"> • The Partial Review Strategy was lacking, alternatives to dumping housing in the Green Belt were not properly examined, and the one site outside the Green Belt found unsuitable. • The Examination should be re-opened. • An increase of 140 dwellings on PR6b is not justified. • In a declared Climate Change Emergency, destroying a huge number of established trees on the golf course is unforgivable. • Pollution levels nearby are already higher than European and WHO standards. • The Harbord Road Area Residents Association have submitted thorough and extensive evidence on the removal of these trees, and GW endorses that submission. • The destruction of trees is contrary to several local plan policies. • The tree survey conclusions posted by the Council are frankly risible. • The University has confirmed that it wishes to provide staff accommodation on some of the site; that is not 'need' as defined. • The modification should be deleted, and the site and trees omitted from the Partial Review. • Is not consistent with policies on the natural environment and related issues such as climate change. • If the proposed main modification cannot be deleted, the number of homes should then be increased from 530 to 531 homes. 	<p>PR-D-0063 (GreenWay Oxfordshire)</p> <p>PR-D-0078 (H & B Henning)</p>	<p>This change is a consequence of the substantive modification at MM 18 and these representations raise similar issues to those made in response to that modification.</p> <p>Reference should therefore be made to the full response under MM 18.</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
	<ul style="list-style-type: none"> • Opposed to the allocation of Green Belt to meet Oxford's unmet need. However, if Green Belt is to be developed, it is vital that it is used as efficiently as possible. • The modification increases the land take to 275 hectares, comprising of all Green Belt land. Averaged across this area, the 4,400 houses would be built at a density of 16 dph. • A significant reduction in the amount of land required can be accommodated by increasing the housing density on sites, bringing the density more in line with local and national plans and policies. • The benefits of high density include lower house prices, lower emissions, and greater social cohesion. 	PR-D-0067 (CPRE)	The Inspector addressed the issue of density in his preliminary advice note (PC5). He stated that overall <i>'the Council has struck a broadly sensible balance between the extent of the land proposed to be removed from the Green Belt, and the need to accommodate development that respects its context. I see nothing unsound in that approach.'</i>
<p>Main 60</p> <p><i>(P.96; Policy PR6b – Land West of Oxford Road; Policy PR6b – point 8 (a))</i></p> <p>Add a second sentence to point 8 (a) to read: <u>'Minor variations in the location of specific uses will be considered where evidence is available.'</u></p>	<ul style="list-style-type: none"> • The proposed main modification is supported. 	PR-D-0010 (North Oxford Consortium)	Noted
<p>Main 61</p>	<ul style="list-style-type: none"> • Supports modification due to the size of the development. 	PR-D-0085 (Oxfordshire CC)	Noted

Modification Number	Comment/Issue	Representation Number	Officer Response
<p><i>(P.96; Policy PR6b - Land West of Oxford Road; Point 8(b))</i></p> <p>Amend to read ' Two pPoints of vehicular access and egress from and to existing highways, primarily from Oxford Road, and connecting within the site.</p>	<ul style="list-style-type: none"> • Suggests deleting 'existing highways, primarily from' as this is superfluous. • The proposed main modification should be deleted as this limits flexibility at the Development Brief stage. • Objection to the possibility of vehicular access to site PR6b via Five Mile Drive, Linkside Avenue, and Lakeside. • This would substantially change the nature of these roads which are narrow and close to houses. This would lead to more noise and pollution. • It should be clear that any access from Lakeside should be restricted to pedestrians and cyclists. • The caveat 'primarily' should be removed. • The word 'primarily' should be removed as the wording would allow a connection between the golf course site and the Lakeside-Linkside Avenue cul-de-sac in the Five Mile Drive area which would be very damaging. • The area is currently being used as a rat-run and traffic will only become worse when cars are travelling along Five Mile Drive to Rothafield Road and Sunderland Avenue towards the Cutteslowe roundabout. 	<p>PR-D-0010 (North Oxford Consortium)</p> <p>PR-D-0063 (GreenWay Oxfordshire)</p> <p>PR-D-0068 (Cllr P Buckley)</p> <p>PR-D-0006 (Prof J Gittins)</p> <p>PR-D-0092 (Wolvercote Neighbourhood Forum)</p> <p>PR-D-0094 (M Treisman)</p>	<p>This Modification resulted from a County Council formal representation at Pre-submission stage (July 2017), this change was carried through and submitted in March 2018 to the Inspector for examination alongside all the relevant evidence. Transport matters related to Main 61 and the Plan as a whole were discussed extensively at the Plan's examination.</p> <p>Whilst officer's do not object to the deletion of 'primarily' as requested by Oxfordshire CC and others, in principle, it is not considered that the change is necessary for soundness.</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
	<ul style="list-style-type: none"> • Traffic in the area will be noisy, intrusive leading to air-polluting rat-run traffic, carrying increased danger especially to children in the area and to the health of the residents. • The Northern Gateway project and other house-building projects north of Oxford will lead to further increases in traffic. • The only other possible vehicular access to site PR6b would be via Lakeside which is a very narrow road through a residential area. This would not be an effective or justified solution and has not been positively prepared as the access to the site has not been considered. 		
<p>Main 62</p> <p><i>(P.98; Policy PR6b - Land West of Oxford Road; Point 11)</i></p> <p>Amend to: 11. The application(s) shall be supported by a phase 1 habitat survey including habitat suitability index (HSI) survey for great crested newts, <u>and protected and notable species surveys as appropriate, including</u> great crested newt presence/absence surveys (dependent on HSI survey), surveys for badgers, breeding birds and reptiles, an internal</p>	<ul style="list-style-type: none"> • The proposed main modification is supported. 	PR-D-0010 (North Oxford Consortium)	Noted

Modification Number	Comment/Issue	Representation Number	Officer Response
building assessment for roosting barn owl, a tree survey and an assessment of water bodies			
<p>Main 63</p> <p><i>(P.98; PR6b - Land West of Oxford Road; Point 13)</i></p> <p>Amend to read 'The application(s) shall be supported by a desk-based archaeological investigation which may then require predetermination evaluations and appropriate mitigation measures. <u>The outcomes of the investigation and mitigation measures shall be incorporated or reflected, as appropriate, in any proposed development scheme.</u>'</p>	<ul style="list-style-type: none"> The proposed main modification is supported. 	PR-D-0010 (North Oxford Consortium)	Noted
<p>Main 64</p> <p><i>(P.98; Policy PR6b - Land West of Oxford Road; Point 15)</i></p> <p>Amend to read 'The application should demonstrate that Thames</p>	<ul style="list-style-type: none"> The treatment of effluent and references to the Environment Agency are not required and should be deleted. Requests that the proposed wording of Policy PR6b Point 15 is amended to read: "...in principle that foul 	PR-D-0010 (North Oxford Consortium) PR-D-0034 (Thames Water)	This modification was proposed following a representation from Natural England and recommendations from the Water Cycle Study.

Modification Number	Comment/Issue	Representation Number	Officer Response
<p>Water has agreed in principle and the Environment Agency have been consulted regarding wastewater treatment capacity and agreement has been reached in principle that foul drainage from the site will be accepted into the drainage its network.'</p>	<p>drainage from the site will be accepted into the foul drainage network."</p>		<p>Whilst officer's do not object to the amended wording, in principle, it is not considered that the change is necessary for soundness.</p>
<p>Main 65</p> <p><i>(P.98; Policy PR6b - Land West of Oxford Road; New Point)</i></p> <p>Add new point 16 to read '<u>The application shall include a management plan for the appropriate re-use and improvement of soils</u>'</p> <p>Re-number subsequent points</p>	<ul style="list-style-type: none"> • Supports modification. • Reference to a soils management plan is unnecessary and should be deleted as this can be addressed at the Development Brief or planning application stage. 	<p>PR-D-0085 (Oxfordshire CC)</p> <p>PR-D-0010 (North Oxford Consortium)</p>	<p>Noted</p> <p>Officers do not agree that this modification should be deleted. It reflects Government advice, including the NPPF.</p>
<p>Main 66</p> <p><i>(P.98; Policy PR6b – Land West of Oxford; Point 17)</i></p> <p>Delete point 17 and renumber subsequent points accordingly</p>	<ul style="list-style-type: none"> • The proposed main modification is supported. • Criterion 17 should not be deleted. • Object to Frieze Farm being the only available site for a replacement golf course when site PR6b is developed. 	<p>PR-D-0010 (North Oxford Consortium)</p> <p>PR-D-0017 (S Stewart)</p> <p>PR-D-0018 (B England)</p>	<p>Noted</p> <p>Officers do not accept that Criterion 17 should be retained.</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
	<ul style="list-style-type: none"> • The site is too small for an 18-hole golf course. • Access is difficult. • There should be a policy that allows provision for an 18-hole golf course with at least the same acreage and facilities that North Oxford Golf Club currently hold. • NPPF paragraph 97 states that recreational facilities cannot be destroyed unless they are replaced by something equivalent or better. Frieze Farm is not bigger nor better. • A golf architect's report has confirmed that Frieze Farm is not a suitable site. • The course is not surplus to requirements. It is forecast that more golf and sports facilities will be required in the future in the Oxford area. • Criterion 17 is required to ensure that the issues to be determined under paragraph 97 of the NPPF are addressed at the point of the planning application. • Criterion 21 does not provide an adequate safeguard for the loss of criterion 17. • There is a possibility that the Inspector in his post hearing advice note did not have the GreenWay evidence and golf architect's report before him. Otherwise it is impossible to understand how he was able to come to his conclusions. • The need for relocation of the full 18 holes to replace the North Oxford Golf Club is overwhelming. 	<p>PR-D-0020 (G Oliver) PR-D-0021 (J Orton) PR-D-0022 (L Lawrence) PR-D-0024 (M Eynon) PR-D-0025 (M Honey) PR-D-0027 (A Gallaher) PR-D-0029 (S Wood) PR-D-0030 (D Humphrey) PR-D-0032 (B Moon) PR-D-0033 (T Brighouse) PR-D-0035 (J Gibbins) PR-D-0037 (A Leake) PR-D-0038 (R Burridge) PR-D-0041 (B Orton) PR-D-0045 (C Lane)</p>	<p>It is implicit from the Inspector's advice note (PC 5) that he considers requirement 17 unnecessary, given requirement 21 of the policy (which in part covers the tests contained in paragraph 74 of the 2012 NPPF) and his preliminary conclusion.</p> <p>The Inspector states <i>'I raised a question at the hearings about the reference in the policy (under criterion 17) to the need for any application to be supported by enough information to demonstrate that the tests contained in paragraph 74 of the (2012) NPPF are met, so as to enable development of the golf course. Policy PR6c – Land at Frieze Farm allocates land for a replacement golf course and from what I saw of the existing golf course, it could, if necessary, provide equivalent or better provision in terms of quantity and quality, on a site very close to the existing facility.</i></p> <p><i>On that basis, notwithstanding questions around whether the existing golf course is surplus to requirements, which are addressed under criterion 21 in any event, the tests in paragraph 74 have been met and criterion 17 can be deleted'.</i></p> <p>The Council would also reiterate the conclusions set out in its Open Space, Sport &</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
		PR-D-0047 (G Davidson) PR-D-0048 (T Hughes) PR-D-0051 (N Clarke) PR-D-0060 (M Gibbard) PR-D-0063 (GreenWay Oxfordshire) PR-D-0064 (N Lawrence) PR-D-0065 (Dr T Buley) PR-D-0071 (North Oxford Golf Club) PR-D-0077 (M Cahill) PR-D-0083 (CDWA) PR-D-0090 (S Blight) PR-D-0093 (KDW) The following representations did not specifically refer	Recreation Assessment and Strategies Part 2: Sports Facilities Strategy (PR103b) which relate to golf provision in the District (Paras 11.49 – 11.54). Specifically, at para 11.51 the Study states that if the North Oxford Golf Course be redeveloped, the long-term shortfall in provision to meet the demands of the forecast population in the Kidlington sub-area alone may be in the order of 6 holes. The minimum replacement requirement to solely meet the needs of the Kidlington population is therefore one 9-hole golf course. The Study also notes at paragraph 11.53 that as golf has a significant commercial element provision will change to reflect patterns of demand. Over time the expectations for golf change and it will be important for clubs to respond to keep facilities as viable and vibrant as possible. England Golf advises that more flexibility in membership options and in course formats are part of the changes needed to ensure increased viability. England Golf commented that there is good open access to golf across the District but notes that there are no Par 3 courses or other shorter formats which are more suitable for the beginner and for young people. Officers can confirm that the Inspector was in receipt of all the documentation submitted as

Modification Number	Comment/Issue	Representation Number	Officer Response
		to MM 66 but made similar comments: PR-D-0019 (S Duke) PR-D-0023 (G Phillips) PR-D-0026 (I Watkins) PR-D-0028 (F Luteijn) PR-D-0031 (IC Architects) PR-D-0036 (R Lloyd) PR-D-0043 (A Freeland) PR-D-0044 (S Hifle) PR-D-0046 (I North) PR-D-0055 (M Fisher) PR-D-0058 (A Oliver) PR-D-0066 (J Ahlquist)	evidence to the EIP by GreenWay Oxfordshire. This was corroborated directly with the Inspector via the Programme Officer. GreenWay Oxfordshire were notified of the Inspector's confirmation. This matter was debated extensively at the hearings, the Inspector reached his preliminary conclusions having considered all available evidence including golf specific evidence in support of Matter 4 statements: <ul style="list-style-type: none"> • Hawtree Ltd – Greenway Oxfordshire • WYG 's North Oxford Golf Course Report – Savills • Gaunt Golf Design Report – Savills • Sports Facilities Strategy (PR103b) – Cherwell District Council
Main 67	<ul style="list-style-type: none"> • The proposed main modification is supported. 	PR-D-0010 (North Oxford Consortium)	Noted

Modification Number	Comment/Issue	Representation Number	Officer Response
<p><i>(P.99; Policy PR6b - Land West of the Oxford Road; Policy PR6b – point 19)</i></p> <p>Amend the final sentence to read: ‘The Delivery Plan shall include a start date for development, demonstration of how the development would be completed by 2031 and a programme showing how the site will contribute towards maintaining a five year supply of housing. (for the site) will be maintained year on year.’</p>	<ul style="list-style-type: none"> • The alteration to this delivery Policy has been requested by the site owners. • Site owners are obviously concerned that the relocation of the golf course will hamper delivery of the site. • A new golf course will take 5-10 years to deliver. PR6b can therefore not contribute to delivering a continuous 5-year housing supply – or indeed any housing development within the plan period. • Site PR6b should be deleted from the allocations. • More explanation needed. 	<p>PR-D-0063 (GreenWay Oxfordshire) PR-D-0091 (Cllr I Middleton)</p>	<p>This matter was previously discussed at the Hearing with the amendment agreed by the Council. This modification has been proposed to provide certainty that a five-year housing land supply can be achieved.</p> <p>For consistency the proposed modification also applies to other site allocation policies (Main Mods 57, 81, 94, 110, 123) and housing delivery policies at Main Mods 136 and 141.</p> <p>Reference should also be made to the detailed responses made under MM 18 and 66.</p>
<p>Main 68</p> <p><i>(P.101; Policy PR6c – Land at Frieze Farm; Whole Policy)</i></p> <p>Amend to read: ‘Land at Frieze Farm will be reserved for the potential construction of a golf course should this be required as a result of the development of Land to</p>	<ul style="list-style-type: none"> • Requests that the proposed wording of Policy PR6c Point 10 is amended to read: “The application should demonstrate that Thames Water and the Environment Agency have been consulted regarding wastewater treatment capacity and agreement has been reached in principle that foul drainage from the site will be accepted into the foul drainage network” • Modification takes us no further with re-provision of a suitable site were the Golf course to be developed. It is not consistent with National Policy which has been incorrectly applied. 	<p>PR-D-0034 (Thames Water)</p> <p>PR-D-0063 (GreenWay Oxfordshire)</p>	<p>Whilst officer’s do not object to the amended wording, in principle, it is not considered that the change is necessary for soundness.</p> <p>Reference should be made to the substantive responses made under MM 18 and 66</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
<p>the West of Oxford Road under Policy PR6b.</p> <p><u>Planning Application Requirements</u></p> <p>1. The application will be expected to be supported by, and prepared in accordance with, a Development Brief for the entire site to be jointly prepared and agreed in advance between the appointed representative(s) of the landowner(s) and Cherwell District Council and in consultation with Oxfordshire County Council. The Development Brief shall <u>include:</u></p> <p><u>(a) A scheme and outline layout for delivery of the required land uses and associated infrastructure</u></p> <p><u>(b) Points of vehicular access and egress from and to existing highways</u></p> <p><u>(c) An outline scheme for public vehicular, cycle, pedestrian and</u></p>	<ul style="list-style-type: none"> • Frieze Farm cannot meet the tests in Para 74 (now 97) of the NPPF to provide a replacement 18-hole course and facilities. • There is a possibility that the Inspector in his post hearing advice note did not have the GreenWay evidence and golf architect's report before him. Otherwise it is impossible to understand how he was able to come to his conclusions. • The Inspector's post hearing advice note encouraged the Council to consider the PR6c site for some housing and a link road however this has not been followed through. • Land at Frieze Farm (PR6c) should be allocated for 220 homes and a link road. 	<p>PR-D-0081 (Turnberry for Exeter College)</p>	<p>The Explanatory Note (November 2019) describes in detail the process the Council took in preparing Main Modifications. A sequential consideration of options took place to avoid unnecessary further alterations to the Green Belt boundaries and to ensure that, if required, there were exceptional circumstances for further alteration. Paragraphs 8.66 – 8.69 specifically refer to the consideration of Frieze Farm.</p>

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	<p><u>wheelchair connectivity within the site, to the built environment, and to existing or new points of connection off-site and to existing or potential public transport services.</u></p> <p><u>(d) Protection and connection of existing public rights of way</u></p> <p><u>(e) incorporate d</u> Design principles that respond to the landscape, <u>canal-side</u> and Green Belt setting and the historic context of Oxford</p> <p><u>(f) Outline measures for securing net biodiversity gains informed by a Biodiversity Impact Assessment in accordance with (2) below</u></p> <p><u>(g) An outline scheme for vehicular access by the emergency services</u></p> <p><u>2. The application(s) shall be supported by the Biodiversity Impact Assessment</u></p>		

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	<p><u>(BIA) based on the DEFRA biodiversity metric (unless the Council has adopted a local, alternative methodology), to be agreed with Cherwell District Council</u></p> <p><u>3. The application(s) shall be supported by a proposed Biodiversity Improvement and Management Plan (BIMP) informed by the findings of the BIA and habitat surveys and to be agreed before development commences. The BIMP shall include:</u></p> <p><u>(a) measures for securing net biodiversity gain within the site and for the protection of wildlife during construction</u></p> <p><u>(b) measures for retaining and conserving protected/notable species (identified within baseline surveys) within the development</u></p> <p><u>(c) demonstration that designated environmental assets will not be harmed,</u></p>		

Modification Number	Comment/Issue	Representation Number	Officer Response
	<p><u>including no detrimental impacts through hydrological, hydro chemical or sedimentation impacts</u></p> <p><u>(d) measures for the protection and enhancement of existing wildlife corridors and the protection of existing hedgerows and trees</u></p> <p><u>(e) the creation of a green infrastructure network with connected wildlife corridors</u></p> <p><u>(f) measures to minimise light spillage and noise levels on habitats especially along wildlife corridors</u></p> <p><u>(g) a scheme for the provision for bird and bat boxes and for the viable provision of designated green walls and roofs</u></p> <p><u>(h) farmland bird compensation</u></p> <p><u>(i) proposals for long-term wildlife management and maintenance</u></p>		

Modification Number	Comment/Issue	Representation Number	Officer Response
<p><u>4. Measures for the retention of the Grade II listed Frieze Farmhouse and an appropriate sensitive setting</u></p> <p><u>5. The application shall be supported by a Heritage Impact Assessment which will identify measures to avoid or minimise conflict with identified heritage assets within and adjacent to the site, particularly the Grade II Listed Frieze Farmhouse. These measures shall be incorporated or reflected, as appropriate, in any proposed development scheme'</u></p> <p><u>6. The application(s) shall be supported by a desk-based archaeological investigation which may then require predetermination evaluations and appropriate mitigation measures. The outcomes of the investigation and mitigation measures shall be incorporated or reflected, as appropriate, in any proposed development scheme</u></p>			

Modification Number	Comment/Issue	Representation Number	Officer Response
<p><u>7. The application(s) shall be supported by a Transport Assessment and Travel Plan including measures for maximising sustainable transport connectivity, minimising the impact of motor vehicles on existing communities and actions for updating the Travel Plan during the construction of the development</u></p> <p><u>8. The application will be supported by a Flood Risk Assessment, informed by a suitable ground investigation and having regard to guidance contained within the Council's Level 1 Strategic Flood Risk Assessment. The Flood Risk Assessment should include detailed modelling of watercourses taking into account allowance for climate change. There should be no ground raising or built development within the modelled flood zone.</u></p> <p><u>9. The application shall be supported by a landscaping</u></p>			

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	<p><u>scheme including details of materials for land modelling (to be agreed with the Environment Agency), together with a management plan for the appropriate re-use and improvement of soils</u></p> <p><u>10.The application should demonstrate that Thames Water has agreed in principle that foul drainage from the site will be accepted into its network.</u></p> <p><u>11. A single comprehensive, outline scheme shall be approved for the entire site. The scheme shall be supported by draft Heads of Terms for developer contributions that are proposed to be secured by way of legal agreement. The application(s) shall be supported by a Delivery Plan demonstrating how the implementation and phasing of the development shall be secured comprehensively and how the provision of supporting infrastructure will be delivered. The Delivery Plan shall include a start date for development and a</u></p>		

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<p><u>programme showing how and when the golf course would be constructed to meet any identified need as a result of the development of Land to the West of Oxford Road (Policy PR6b)</u></p>			
<p>Main 69 <i>(P.103; Paragraph 5.90; Last sentence)</i></p> <p>Amend last sentence to read: A clearly defined field boundary partially marks the extent of the area that is identified for development and the remainder of the southern boundary follows a former historic field boundary.</p>	<ul style="list-style-type: none"> Proposed modification supported 	<p>PR-D-0014 (Pegasus for Barwood Development)</p>	<p>Noted</p>
<p>Main 71 <i>(P.104/105; Paragraph 5.96; New Point & Points 5 to 8)</i></p> <p>Renumber points 5 to 8 as 6 to 9</p>	<ul style="list-style-type: none"> Fully support Main 71, Main 87 and Main 88 relating to PR7b. Increasing housing capacity on PR7a and PR7b will reduce land available for outdoor sports facilities. Policies PR7a and PR7B should ensure delivery of sufficient new playing fields, formal and informal open 	<p>PR-D-0080 (Kidlington PC)</p>	<p>The comments from Kidlington PC in support of this modification are noted.</p> <p>The Council will ensure there is consistent engagement with Parish Councils in preparing the development briefs. A change to the MMs is not required.</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
<p>Insert new point 5. To read: <u>Retention and renovation of the Grade II Listed Stratfield Farmhouse and the protection of its historic setting.</u></p>	<p>space and sports facilities to meet the existing deficiencies and the needs of the new population.</p> <ul style="list-style-type: none"> It is essential that the policy specifies that two access points are provided. Delivery of a new access to Stratfield Brake will benefit Kidlington residents and reduce traffic on the network. An additional access from Croxford Gardens will avoid the space surrounding the central Listed Buildings and Nature Conservation Area. A pedestrian / cycle route from east to west across the site will assist in promoting non-car travel and access to public transport. Consider that Kidlington Parish Council should be partners in the preparation of the Development Brief for PR7b rather than Oxford City Council. 		
<p>Main 72 <i>(P.106; Policy PR7a – Land South East of Kidlington; Policies Map – Land South East of Kidlington)</i></p> <p>Increase extent of residential area Reduce extent of Outdoor Sports Provision Amend revised Green Belt boundary (see attached)</p>	<ul style="list-style-type: none"> Supports proposed modification. Considers the proposed modification soundly based, being positively prepared, justified and effective. <ul style="list-style-type: none"> Promised infrastructure enhancements and green space provisions are being eroded for the sake of expediency. 	<p>PR-D-0014 (Pegasus for Barwood Developments) PR-D-0054 (Turley for Landowner for the northern parcel of PR7a)</p> <p>PR-D-0080 (Kidlington PC) PR-D-0091 (Cllr I Middleton)</p>	<p>Noted</p> <p>This change is a consequence of the substantive modification at MM 19 and these representations raise similar issues to those made in response to that modification.</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
	<ul style="list-style-type: none"> • Object to the release of additional Green Belt as an extension to the area proposed for development of PR7a • The site extension proposed conflicts with available evidence and is not justified • There is a lack of evidence and no consideration of mitigation / offset measures as required by the NPPF in justifying the release of Green Belt • There is no evidence on consideration of the impact on local schools and other community infrastructure close to PR7 as a result of the relocation of 200 dwellings from PR10 to PR7a. The diminished opportunity to meet a local shortfall in playing fields is also not considered in evidence • The perception of a gap between the settlements of Oxford and Kidlington will be eradicated • Additional vehicles at peak times from the enlarged PR7a will negatively impact the free movement of traffic along the A4260, on Bicester Road, on queues at the roundabout and air quality in Kidlington • A requirement should be added to Policy PR7a for the provision of a new footbridge across the A4260 to link to Stratfield Brake 		<p>Reference should therefore be made to the full response under MM 19.</p>
<p>Main 73 <i>(P.106; Policy PR7a – Land South East of Kidlington; Policies Map – Land South East of Kidlington)</i></p>	<ul style="list-style-type: none"> • Considers the proposed modification soundly based, being positively prepared, justified and effective. 	<p>PR-D-0054 (Turley for Landowner for the northern parcel of PR7a)</p>	<p>Noted</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
<p>Amend the policies map to include 'new green space/parks' notation over (in addition to) 'Outdoor Sports provision' on the policies map (see attached).</p>	<ul style="list-style-type: none"> • Objection raised concerning the increased in housing and reduction of green space. • Existing roads are already busy and congested. • The existing green space is valuable to the community. • Object to the release of additional Green Belt as an extension to the area proposed for development of PR7a. • The site extension proposed conflicts with available evidence and is not justified. • There is a lack of evidence and no consideration of mitigation / offset measures as required by the NPPF in justifying the release of Green Belt. • There is no evidence on consideration of the impact on local schools and other community infrastructure close to PR7 as a result of the relocation of 200 dwellings from PR10 to PR7a. The diminished opportunity to meet a local shortfall in playing fields is also not considered in evidence. • The perception of a gap between the settlements of Oxford and Kidlington will be eradicated. • Additional vehicles at peak times from the enlarged PR7a will negatively impact the free movement of traffic along the A4260, on Bicester Road, on queues at the roundabout and air quality in Kidlington. • A requirement should be added to Policy PR7a for the provision of a new footbridge across the A4260 to link to Stratfield Brake. 	<p>PR-D-0080 (Kidlington PC) PR-D-0052 (F Gibson)</p>	<p>This change is a consequence of the substantive modification at MM 19 and these representations raise similar issues to those made in response to that modification.</p> <p>Reference should therefore be made to the full response under MM 19.</p>
<p>Main 74</p>	<ul style="list-style-type: none"> • Supports proposed modification. • Considers the proposed modification soundly based, being positively prepared, justified and effective. 	<p>PR-D-0014 (Pegasus for</p>	<p>Noted</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
<p><i>(P.107; Policy PR7a – Land South East of Kidlington; Point 1)</i></p> <p>Amend to read: ‘Construction of 430 230 dwellings (net) on 21 11 hectares of land (the residential area as shown). The dwellings to be constructed at an approximate average net density of 35 dwellings per hectare.’</p>	<ul style="list-style-type: none"> • Object to the release of additional Green Belt as an extension to the area proposed for development of PR7a. • The site extension proposed conflicts with available evidence and is not justified. • There is a lack of evidence and no consideration of mitigation / offset measures as required by the NPPF in justifying the release of Green Belt. • There is no evidence on consideration of the impact on local schools and other community infrastructure close to PR7a as a result of the relocation of 200 dwellings from PR10 to PR7a. The diminished opportunity to meet a local shortfall in playing fields is also not considered in evidence. • The perception of a gap between the settlements of Oxford and Kidlington will be eradicated. • Additional vehicles at peak times from the enlarged PR7a will negatively impact the free movement of traffic along the A4260, on Bicester Road, on queues at the roundabout and air quality in Kidlington. • A requirement should be added to Policy PR7a for the provision of a new footbridge across the A4260 to link to Stratfield Brake. 	<p>Barwood Developments) PR-D-0054(Turley for Landowner for the northern parcel of PR7a)</p> <p>PR-D-0070 (Harbord Road Area Residents Assoc) PR-D-0080 (Kidlington PC)</p> <p>PR-D-0067 (CPRE)</p>	<p>This change is a consequence of the substantive modification at MM 19 and these representations raise similar issues to those made in response to that modification.</p> <p>Reference should therefore be made to the full response under MM 19.</p> <p>The perceived discrepancies between the areas indicated in MM 74 and MM 75 are as the result of the ‘rounding’ of numbers.</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
	<ul style="list-style-type: none"> • MM 74 increases the residential area from 11 to 21 hectares. I.e. an increase of 10 hectares. • The increase in MM 74 (10 has) is not consistent with the decrease (10.5has) in MM75. • The reduction of 10.5 has in MM75 must be amended to 10has instead of 10.5has to be consistent with MM74 thus giving the benefit of any rounding to the community. • Opposed to the allocation of Green Belt to meet Oxford’s unmet need. However, if Green Belt is to be developed, it is vital that it is used as efficiently as possible. • The modification increases the land take to 275 hectares, comprising of all Green Belt land. Averaged across this area, the 4,400 houses would be built at a density of 16 dph. • A significant reduction in the amount of land required can be accommodated by increasing the housing density on sites, bringing the density more in line with local and national plans and policies. • The benefits of high density include lower house prices, lower emissions, and greater social cohesion. • Object to the proposed main modification due to the high harm caused to the Green Belt in the area including the Kidlington Gap. • The PR7a site should return to 230 homes. • The proposed main modification does not represent the most appropriate strategy for development. 	<p>PR-D-0069 (Bloombridge)</p>	<p>Reference should therefore be made to the full response under MM 19.</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
	<ul style="list-style-type: none"> • The proposed main modification fails under the terms of paragraph 84 of the NPPF which requires LPAs, when reviewing Green Belt boundaries, to take account of the need to promote sustainable patterns of development and the need to consider the consequences for sustainable development in their choices. • The Council’s preferred approach has departed from the advice provided by the Inspector. • References to the respondent’s evidence on landscape, Green Belt and transport that supports the PR6c site for residential. • Issues of the additional release of Green Belt land identified are: <ul style="list-style-type: none"> ○ the proposed southern boundary being weak or non-existent. ○ It could set a dangerous precedent for further release between Kidlington and the A34. ○ It leaves a large triangular field in which development will be difficult to resist. • An incremental approach to Green Belt harm is caused. 	PR-D-0081 (Turnberry for Exeter College)	Reference should therefore be made to the full response under MM 19.
<p>Main 75</p> <p><i>(P.107; Policy PR7a – Land South East of Kidlington; Point 4)</i></p> <p>Amend to read: The provision of 21.5 11 hectares of land to provide formal sports facilities for the development and</p>	<ul style="list-style-type: none"> • Supports proposed modification. • Considers the proposed modification soundly based, being positively prepared, justified and effective. 	PR-D-0014 (Pegasus for Barwood Developments) PR-D-0054(Turley for Landowner for the northern parcel of PR7a)	Noted

Modification Number	Comment/Issue	Representation Number	Officer Response
for the wider community and green infrastructure within the Green Belt	<ul style="list-style-type: none"> • Object to the proposed main modification due to the high harm caused to the Green Belt in the area including the Kidlington Gap. • The PR7a site should return to 230 homes. • MM 74 increases the residential area from 11 to 21 hectares. I.e. an increase of 10 hectares. • The increase in MM 74 (10 has) is not consistent with the decrease (10.5has) in MM75. • The reduction of 10.5 has in MM75 must be amended to 10has instead of 10.5has to be consistent with MM74 thus giving the benefit of any rounding to the community. • The proposed modification reduces provision of green infrastructure and recreation facilities. • Object to the release of additional Green Belt as an extension to the area proposed for development of PR7a. • The site extension proposed conflicts with available evidence and is not justified. • There is a lack of evidence and no consideration of mitigation / offset measures as required by the NPPF in justifying the release of Green Belt. • There is no evidence on consideration of the impact on local schools and other community infrastructure close to PR7 as a result of the relocation of 200 dwellings from PR10 to PR7a. The diminished opportunity to meet a local shortfall in playing fields is also not considered in evidence. 	<p>PR-D-0069 (Bloombridge)</p> <p>PR-D-0070 (Harbord Road Area Residents Assoc)</p> <p>PR-D-0080 (Kidlington PC)</p> <p>PR-D-0091 (Cllr I Middleton)</p>	<p>This change is a consequence of the substantive modification at MM 19 and these representations raise similar issues to those made in response to that modification.</p> <p>Reference should therefore be made to the full response under MM 19.</p> <p>The proposed modification will result in a reduced area being retained in the Green Belt and available for formal sports for the development and the wider community and green infrastructure within the Green Belt. However, given that the Playing Pitch Strategy (PPS) (PR99) indicated a need for an additional 4ha of pitches to 2031, the reduced area of 11 hectares is considered sufficient to accommodate the required pitch provision together with green infrastructure.</p> <p>The site promoter submission (PR119) demonstrates that the remaining 11 hectares can accommodate 4 ha of pitch provision and green infrastructure.</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
	<ul style="list-style-type: none"> The perception of a gap between the settlements of Oxford and Kidlington will be eradicated. Additional vehicles at peak times from the enlarged PR7a will negatively impact the free movement of traffic along the A4260, on Bicester Road, on queues at the roundabout and air quality in Kidlington. A requirement should be added to Policy PR7a for the provision of a new footbridge across the A4260 to link to Stratfield Brake. 		
<p>Main 76</p> <p><i>(P.107; Policy PR7a – Land south east of Kidlington; Policy PR7a – point 9 (a))</i></p> <p>Add a second sentence to point 9 (a) to read: <u>‘Minor variations in the location of specific uses will be considered where evidence is available.’</u></p>	<ul style="list-style-type: none"> Supports proposed modification. Considers the proposed modification soundly based, being positively prepared, justified and effective. Supports modification if the word ‘minor’ is deleted. 	<p>PR-D-0014 (Pegasus for Barwood Developments) PR-D-0054 (Turley for Landowner for the northern parcel of PR7a)</p> <p>PR-D-0085 (Oxfordshire CC)</p>	<p>Noted</p> <p>Officers do not support the word ‘minor’ being deleted.</p>
<p>Main 77</p> <p><i>(P.109; Policy PR7a – Land South East of Kidlington; Point 12)</i></p> <p>Amend to: ' The application(s) shall be supported by a phase 1 habitat survey including habitat suitability index (HSI) survey for great crested newts, <u>and</u></p>	<ul style="list-style-type: none"> Supports proposed modification Considers the proposed modification soundly based, being positively prepared, justified and effective. 	<p>PR-D-0014 (Pegasus for Barwood Developments) PR-D-0054 (Turley for Landowner for the northern parcel of PR7a)</p>	<p>Noted</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
<p><u>protected and notable species surveys as appropriate, including</u> great crested newt presence/absence surveys (dependent on HSI survey), surveys for badgers, breeding birds and reptiles, an internal building assessment for roosting barn owl, a tree survey and an assessment of water bodies.'</p>			
<p>Main 78 <i>(P.109; Policy PR7a – Land South East of Kidlington; Point 14)</i> Amend to read 'The application should demonstrate that Thames Water, <u>Natural England has agreed in principle and the Environment Agency have been consulted regarding wastewater treatment capacity and agreement has been reached</u> in principle that foul drainage from the site will be accepted into <u>the drainage its</u> network.'</p>	<ul style="list-style-type: none"> • Considers the proposed modification soundly based, being positively prepared, justified and effective. • Requests that the proposed wording of Policy PR7a Point 14 is amended to read: "...in principle that foul drainage from the site will be accepted into the foul drainage network." • Objection raised to proposed re-wording of Policy PR7a point 14: It implies agreement in principle for foul drainage to enter the network needs to be secured from each of Thames Water, the Environment Agency and Natural England • In principle approval should be sought through Thames Water only, consistent with NPPF para 183 which 	<p>PR-D-0054 (Turley for Landowner for the northern parcel of PR7a)</p> <p>PR-D-0034 (Thames Water)</p> <p>PR-D-0014 (Pegasus for Barwood Developments)</p>	<p>Noted</p> <p>Whilst officer's do not object to the amended wording, in principle, it is not considered that the change is necessary for soundness.</p> <p>This modification follows representations from Natural England and recommendations from the Water Cycle Study.</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
	<p>discourages use of the planning system duplicating other consent regimes</p> <ul style="list-style-type: none"> • There is nothing in the Water Cycle Addendum (PR105) to support the change as it concludes the change in discharge is not significant • As such the modification is considered unsound as it is neither justified, effective nor consistent with national policy 		
<p>Main 79</p> <p><i>(P.109; Policy PR7a – Land South East of Kidlington; Point 16)</i></p> <p>Amend to read 'The application(s) shall be supported by a desk-based archaeological investigation which may then require predetermination evaluations and appropriate mitigation measures. <u>The outcomes of the investigation and mitigation measures shall be incorporated or reflected, as appropriate, in any proposed development scheme</u>'</p>	<ul style="list-style-type: none"> • Supports proposed modification. • Considers the proposed modification soundly based, being positively prepared, justified and effective. 	<p>PR-D-0014 (Pegasus for Barwood Developments)</p> <p>PR-D-0054 (Turley for Landowner for the northern parcel of PR7a)</p>	<p>Noted</p>
<p>Main 80</p> <p><i>(P.109; Policy PR7a – Land South East of Kidlington; New Point)</i></p>	<ul style="list-style-type: none"> • Supports modification. • Considers the proposed modification soundly based, being positively prepared, justified and effective. 	<p>PR-D-0085 (Oxfordshire CC)</p> <p>PR-D-0054 (Turley for</p>	<p>Noted</p> <p>Noted</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
<p>Add new point 17 to read '<u>The application shall include a management plan for the appropriate re-use and improvement of soils</u>'</p> <p>Re-number subsequent points</p>	<ul style="list-style-type: none"> • Objection raised to the requirement In Policy PR7a for provision of a “management plan for the appropriate re-use and improvement of soils”: • There is no policy support provided within the reasoning for the modification • The policy is vague and imprecise as to what constitutes “appropriate re-use” and it is not clear that the impact of the policy in terms of cost or viability has been assessed • The SA does not provide any additional evidence to support the change and indicates no change to SA findings as a result • Potential for soil improvement on site is limited • The purpose of the change is unclear and is considered unsound as it is not justified 	<p>Landowner for the northern parcel of PR7a)</p> <p>PR-D-0014 (Pegasus for Barwood Developments)</p>	<p>Officers do not agree that this modification should be deleted. It reflects Government advice, including the NPPF.</p>
<p>Main 81</p> <p><i>(P.110; Policy PR7a – Land south east of Kidlington; Policy PR7a – point 19.)</i></p> <p>Amend the final sentence to read: ‘The Delivery Plan shall include a start date for development, demonstration of how the development would be completed by 2031 and a</p>	<ul style="list-style-type: none"> • Considers the proposed modification soundly based, being positively prepared, justified and effective. • Objection continues to be raised to Policy PR7a point 19: • The proposed amended wording remains unclear and could be used as a mechanism to apply a brake on delivery, contrary to NPPF para 58 	<p>PR-D-0054 (Turley for Landowner for the northern parcel of PR7a)</p> <p>PR-D-0014 (Pegasus for Barwood Developments)</p>	<p>Noted</p> <p>This matter was previously discussed at the Hearings where this amendment was agreed by the Council. This modification has been proposed to provide certainty that a five year housing land supply can be achieved. It is also justified in light of the urgent need for</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
<p>programme showing how the site will contribute towards maintaining a five year supply of housing. (for the site) will be maintained year on year.</p>	<ul style="list-style-type: none"> • Comments raised by the site promoter during Matter 5 discussions at the Hearings and Barwood’s written hearing statement paras 2.21 to 2.23 remain valid • Barwood are committed to deliver the site at the earliest opportunity and given market signals it expects delivery to proceed apace once on site • The removal of the phasing restriction on the site is welcomed (Main 137), but concern remains over the purpose and application of this policy requirement, which is considered unsound as it is neither justified, effective or consistent with national policy. 		<p>housing and land being released in the Green Belt for that reason.</p> <p>For consistency the proposed modification also applies to other site allocation policies (Main Mods 57, 67, 94, 110, 123) and housing delivery policies at Main Mods 136 and 141.</p>
<p>Main 82</p> <p><i>(P.111; Policy PR7b – Land at Stratfield Farm; Policies Map-Land at Stratfield Farm)</i></p> <p>Increase Residential area Reduce Nature Conservation Area Amend Revised Green Belt boundary Amend green space boundary (See attached)</p>	<ul style="list-style-type: none"> • Objection raised concerning the increased in housing and reduction of green space. • Existing roads are already busy and congested. • The existing green space is valuable to the community. • Residential space is being increased at the expense of the conservation area and amendments are being made to Green Belt boundaries. 	<p>PR-D-0052 (F Gibson) PR-D-0091 (Cllr I Middleton)</p>	<p>This change is a consequence of the substantive modification at MM 20 and these representations raise similar issues to those made in response to that modification.</p> <p>Reference should therefore be made to the full response under MM 20.</p>
<p>Main 83</p> <p><i>(P.112; Policy PR7b – Land at Stratfield Farm; Point 1)</i></p>	<ul style="list-style-type: none"> • Welcomes the recognition that land at Stratfield Farm can accommodate more than 100 dwellings. • The site promoter considers the site can accommodate up to 175 dwellings. 	<p>PR-D-0075 (Carter Jonas for Manor Oak)</p>	<p>Whilst acknowledging the comments of Carter Jonas on behalf of Manor Oak the Council, for the reasons set out in its evidence including the Site Capacity Sense Check (PR110) does not agree with the site capacity proposed.</p>

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<p>Amend to read: ‘Construction of 120 100 homes (net) on 5 4 hectares of land (the residential area). The dwellings to be constructed at an approximate average net density of 25 dwellings per hectare.</p>	<ul style="list-style-type: none"> An illustrative plan is attached to the submission to demonstrate how 140 dwellings could be provided on the 5 ha development site area, considered to be the best and most efficient use of the available land. The illustrative plan excludes the listed farmhouse and its curtilage (including the orchards) from the proposed allocation area to ensure efficient development of the site is not hampered by heritage related constraints. The proposed main modification does not represent the most appropriate strategy for development. The proposed main modification fails under the terms of paragraph 84 of the NPPF which requires LPAs, when reviewing Green Belt boundaries, to take account of the need to promote sustainable patterns of development and the need to consider the consequences for sustainable development in their choices. The Council’s preferred approach has departed from the advice provided by the Inspector. References to the respondent’s evidence on landscape, Green Belt and transport that supports the PR6c site for residential. Opposed to the allocation of Green Belt to meet Oxford’s unmet need. However, if Green Belt is to be developed, it is vital that it is used as efficiently as possible. The modification increases the land take to 275 hectares, comprising of all Green Belt land. Averaged 	<p>PR-D-0081 (Turnberry for Exeter College)</p> <p>PR-D-0067 (CPRE)</p>	<p>Reference should also be made to the officer response under MM 20 above.</p> <p>The Explanatory Note (November 2019) describes in detail the process the Council took in preparing Main Modifications. A sequential consideration of options took place to avoid unnecessary further alterations to the Green Belt boundaries and to ensure that, if required, there were exceptional circumstances for further alteration. Paragraphs 8.66 – 8.69 specifically refer to the consideration of Frieze Farm.</p> <p>The Inspector addressed the issue of density in his preliminary advice note (PC5). He stated that overall <i>‘the Council has struck a broadly sensible balance between the extent of the land proposed to be removed from the Green Belt, and the need to accommodate</i></p>

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	<p>across this area, the 4,400 houses would be built at a density of 16 dph.</p> <ul style="list-style-type: none"> A significant reduction in the amount of land required can be accommodated by increasing the housing density on sites, bringing the density more in line with local and national plans and policies. The benefits of high density include lower house prices, lower emissions, and greater social cohesion. 		<p><i>development that respects its context. I see nothing unsound in that approach.'</i></p>
<p>Main 84 <i>(P.112; Policy PR7b – Land at Stratfield Farm; Point 7)</i></p> <p>Amend to read: 'Creation of a nature conservation area on 6.3 5.3 hectares of land as shown on the inset Policies Map, incorporating the community orchard and with the opportunity to connect to and extend Stratfield Brake District Wildlife Site.'</p>	<ul style="list-style-type: none"> The proposed modification reduces the conservation area and green spaces originally proposed as mitigation for Green Belt erosion. 	<p>PR-D-0091 (Cllr I Middleton)</p>	<p>This modification is a consequence of MM 20 which extends the residential area of this site.</p>
<p>Main 85 <i>(P.112; Policy PR7b – Land at Stratfield Farm; Point 9)</i></p>	<ul style="list-style-type: none"> Consider that Kidlington Parish Council should be partners in the preparation of the Development Brief for PR7b rather than Oxford City Council. 	<p>PR-D-0080 (Kidlington PC)</p>	<p>The Council will ensure there is consistent engagement with Parish Councils in preparing the development briefs. A change to the MMs is not required.</p>

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<p>Amend last sentence to read 'The Development Brief shall be prepared in consultation with Oxfordshire County Council, and Oxford City Council <u>and the Canal and River Trust</u>'</p>			
<p>Main 86</p> <p><i>(P.112; Policy PR7b – Land at Stratfield Farm; Policy PR7b – point 10 (a))</i></p> <p>Add a second sentence to point 10 (a) to read: <u>'Minor variations in the location of specific uses will be considered where evidence is available.'</u></p>	<ul style="list-style-type: none"> • Supports modification if the word 'minor' is deleted. 	<p>PR-D-0085 (Oxfordshire CC)</p>	<p>Officers do not support the word 'minor' being deleted.</p>
<p>Main 87</p> <p><i>(P.113; Policy PR7b – Land at Stratfield Farm; Policy PR7b – Point 10 (b))</i></p> <p>Points of vehicular access and egress from and to existing highways with, <u>unless otherwise approved</u>, at least two separate points:</p>	<ul style="list-style-type: none"> • Fully support Main 71, Main 87 and Main 88 relating to PR7b. • Increasing housing capacity on PR7a and PR7b will reduce land available for outdoor sports facilities. Policies PR7a and PR7B should ensure delivery of sufficient new playing fields, formal and informal open space and sports facilities to meet the existing deficiencies and the needs of the new population. • It is essential that the policy specifies that two access points are provided. Delivery of a new access to Stratfield Brake will benefit Kidlington residents and 	<p>PR-D-0080 (Kidlington PC)</p>	<p>The comments from Kidlington PC in support of this modification are noted.</p> <p>The Council will ensure there is consistent engagement with Parish Councils in preparing the development briefs. A change to the MMs is not required.</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
	<p>reduce traffic on the network. An additional access from Croxford Gardens will avoid the space surrounding the central Listed Buildings and Nature Conservation Area.</p> <ul style="list-style-type: none"> • A pedestrian / cycle route from east to west across the site will assist in promoting non-car travel and access to public transport. • Consider that Kidlington Parish Council should be partners in the preparation of the Development Brief for PR7b rather than Oxford City Council. • Supports modification but suggests amendment to read: ‘The scheme shall include an access road from the Oxford Road service road connecting to the Kidlington roundabout to the easternmost development parcels and the Stratfield Farm building complex only, as shown on the inset Policies Map. 	<p>PR-D-0085 (Oxfordshire CC)</p>	<p>Oxfordshire CC proposed amendment is noted. They are issues more appropriately addressed through the development brief.</p>

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<p>Main 88</p> <p><i>(P.113; Policy PR7b – Land at Stratfield Farm; Policy PR7b – Point 10 (c))</i></p> <p>The scheme shall include an access road from the Kidlington roundabout to the easternmost development parcels and the Stratfield Farm building complex only, as shown on the inset Policies Map.</p>	<ul style="list-style-type: none"> • Supports modification but suggests amendment to read: ‘The scheme shall include an access road from the Oxford Road service road connecting to the Kidlington roundabout to the easternmost development parcels and the Stratfield Farm building complex only, as shown on the inset Policies Map. • Fully support Main 71, Main 87 and Main 88 relating to PR7b. • Increasing housing capacity on PR7a and PR7b will reduce land available for outdoor sports facilities. Policies PR7a and PR7B should ensure delivery of sufficient new playing fields, formal and informal open space and sports facilities to meet the existing deficiencies and the needs of the new population. • It is essential that the policy specifies that two access points are provided. Delivery of a new access to Stratfield Brake will benefit Kidlington residents and reduce traffic on the network. An additional access from Croxford Gardens will avoid the space surrounding the central Listed Buildings and Nature Conservation Area. • A pedestrian / cycle route from east to west across the site will assist in promoting non-car travel and access to public transport. 	<p>PR-D-0085 (Oxfordshire CC)</p> <p>PR-D-0080 (Kidlington PC)</p>	<p>Noted. They are issues more appropriately addressed through the development brief.</p> <p>The comments from Kidlington PC in support of this modification are noted.</p> <p>The Council will ensure there is consistent engagement with Parish Councils in preparing the development briefs. A change to the MMs is not required.</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
	<ul style="list-style-type: none"> Consider that Kidlington Parish Council should be partners in the preparation of the Development Brief for PR7b rather than Oxford City Council. 		
<p>Main 90</p> <p><i>(P.115; Policy PR7b - Land at Stratfield Farm; Point 16)</i></p> <p>Amend to read 'The application should demonstrate that Thames Water, Natural England has agreed in principle and the Environment Agency, have been consulted regarding wastewater treatment capacity and agreement has been reached in principle that foul drainage from the site will be accepted into <u>the drainage its</u> network.'</p>	<ul style="list-style-type: none"> Requests that the proposed wording of Policy PR7b Point 16 is amended to read: "...in principle that foul drainage from the site will be accepted into the foul drainage network." 	PR-D-0034 (Thames Water)	Whilst officer's do not object to the amended wording, in principle, it is not considered that the change is necessary for soundness.
<p>Main 93</p> <p><i>(P.115; Policy PR7b - Land at Stratfield Farm; New Point)</i></p> <p>Add new point 19 to read '<u>The application shall include a management plan for the appropriate re-use and improvement of soils</u>'</p>	<ul style="list-style-type: none"> Supports modification. 	PR-D-0085 (Oxfordshire CC)	Noted

Modification Number	Comment/Issue	Representation Number	Officer Response
	<p>developed, it is vital that it is used as efficiently as possible.</p> <ul style="list-style-type: none"> The modification increases the land take to 275 hectares, comprising of all Green Belt land. Averaged across this area, the 4,400 houses would be built at a density of 16 dph. A significant reduction in the amount of land required can be accommodated by increasing the housing density on sites, bringing the density more in line with local and national plans and policies. The benefits of high density include lower house prices, lower emissions, and greater social cohesion. 		
<p>Main 96</p> <p><i>(P.121; Policy PR8 - Land East of the A44; Point 4)</i></p> <p>Amend to read 'The provision of a primary school with at least three forms of entry on 3.2 hectares of land in the location shown'</p>	<ul style="list-style-type: none"> The proposed main modification is supported. The Tripartite's education consultants (EFM) advised that the level of provision will be the maximum required on the site and is most likely to be less. Supports modification. 	<p>PR-D-0057 (David Lock for the PR8 parties)</p> <p>PR-D-0085 (Oxfordshire CC)</p>	<p>Noted</p> <p>Noted</p>
<p>Main 97</p> <p><i>(P.121; Policy PR8 - Land East of the A44; Point 5)</i></p> <p>Amend to read 'The provision of a primary school with at least two</p>	<ul style="list-style-type: none"> The proposed main modification is supported. The Tripartite's education consultants (EFM) advised that the level of provision will be the maximum required on the site and is most likely to be less. 	<p>PR-D-0085 Oxfordshire CC)</p> <p>PR-D-0057 (David Lock for the PR8 parties)</p>	<p>Noted</p> <p>Noted</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
forms of entry on 2.2 hectares of land in the location shown if required in consultation with the Education Authority and unless otherwise agreed with Cherwell District Council.'			
<p>Main 98</p> <p><i>(P.122; Policy PR8 - Land East of the A44; Point 17)</i></p> <p>Amend last sentence to read 'The Development Brief shall be prepared in consultation with Oxfordshire County Council, and Oxford City Council, <u>Network Rail and the Canal and River Trust</u>'</p>	<ul style="list-style-type: none"> • Yarnton Parish Council should be included as a consultee. 	<p>PR-D-0091 (Cllr I Middleton)</p> <p>PR-D-0056 (Yarnton Parish Council)</p>	<p>The Council will ensure there is consistent engagement with Parish Councils in preparing the development briefs. A change to the MMs is not required.</p>
<p>Main 99</p> <p><i>(P.122; Policy PR8 – Land east of the A44; Policy PR8 – 18 (a))</i></p> <p>Add a second sentence to point 18 (a) to read: <u>'Minor variations in the location of specific uses will be considered where evidence is available.'</u></p>	<ul style="list-style-type: none"> • The intent of the proposed main modification is welcomed however would like to delete the word 'minor' to add the necessary flexibility for the site. • Supports modification if the word 'minor' is deleted. 	<p>PR-D-0057 (David Lock for the PR8 parties)</p> <p>PR-D-0085 (Oxfordshire CC)</p>	<p>Officers do not support the word 'minor' being deleted.</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
<p>Main 100</p> <p><i>(P.122; Policy PR8 - Land East of the A44; Point 18 b)</i></p> <p>Amend to read: 'Points of vehicular access and egress from and to existing highways with at least two separate, connecting points from and to the A44 and including the use of the existing Science Park access road.'</p>	<ul style="list-style-type: none"> • Supports modification. • There is little detail on how traffic flow along the A44 will be managed and the potential for additional congestion has not been addressed. Traffic will back up within the PR8 site which will in turn delay buses. • The proposed modification has huge implications for traffic flow along the A44, and thus has not been assessed. More detail is needed. • The Transport Assessment Addendum (PR109) acknowledges that traffic along the A44 will be worse and beyond capacity, and that further junctions will increase traffic delays and hinder bus flow without including any assessment of these additional junctions with PR8. Unsound, not yet positively prepared. 	<p>PR-D-0085 Oxfordshire CC)</p> <p>PR-D-0091 (Cllr I Middleton)</p> <p>PR-D-0056 (Yarnton PC)</p>	<p>Noted</p> <p>This point is not directly related to this proposed main modification. Traffic along the A44 was discussed extensively at the EiP including detailed discussions of transport evidence. The Inspector in his Preliminary Advice Note (PR5) stated <i>'It is fair to note at the outset that building 4,400 homes Anywhere in Cherwell is likely to have significant impacts in traffic terms. However, the principle of siting the required allocations along an established transport corridor is a sound one. I accept that traffic along this transport corridor is already relatively heavy, but the route clearly offers the best opportunity to provide incoming residents with opportunities to travel by means other than the private car. Moreover, development along the corridor can reasonably be expected to contribute to transport improvements along it, including those that encourage means of access into Oxford by means other than the private car.'</i></p> <p>Transport Assessment Addendum (document PR109) was prepared to inform the Main Modifications and concludes that the proposed reallocation of dwellings resulting from the deletion of site PR10 from the Plan is</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
			<p>expected to have a positive effect upon overall levels of road traffic (and associated congestion at peak times) that have been forecast to result from the allocation of 4,400 homes being considered.</p>
<p>Main 101</p> <p><i>(P.123; Policy PR8 - Land East of the A44; Point 18 (f))</i></p> <p>Amend to read: 'In consultation with Oxfordshire County Council and Network Rail, proposals for the closure/unadoption of Sandy Lane, the closure of Sandy Lane to motor vehicles...'</p>	<ul style="list-style-type: none"> • Agrees with the OSM forecast in Appendix 1 Table 4.1, p.21. • Closure of Sandy Lane would cause massive disruption and is unacceptable to Yarnton residents. • The closure of Sandy Lane to vehicular traffic will be detrimental to the residents of the surrounding villages. The concept of improving the sustainability of this route for use by pedestrians and cyclists is desirable but do not need to be to the detriment of vehicular travel. • Consultation to involve local residents. • Main 101 should be amended to ensure consultation includes Yarnton Parish Council, Begbroke Parish Council and Kidlington Parish Council. 	<p>PR-D-0082 (B&YGBC) PR-D-0088 (D Hipkiss) PR-D-0056 (Yarnton PC)</p>	<p>The closure of Sandy Lane was considered at the EIP. In his post hearing advice note (PC5) the Inspector stated '<i>I recognise that the allocations, and other factors, will lead to changes to the highway network, like the closure to vehicular traffic of Sandy Lane. However, while such changes might be inconvenient, to some, the impact they would involve is not such that it renders the Council's approach unreasonable, or the Plan unsound.</i>'</p> <p>The Council will ensure there is consistent engagement with Parish Councils in preparing the development briefs. A change to the MMs is not required.</p> <p>Infrastructure providers such as Network Rail and County Council as Local Highway Authority undertake specific consultations when progressing their plans and infrastructure schemes.</p>
<p>Main 104</p> <p><i>(P.124; Policy PR8 - Land East of the A44; Point 22)</i></p>	<ul style="list-style-type: none"> • Supports modification. 	<p>PR-D-0085 Oxfordshire CC)</p>	<p>Noted</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
<p>Amend to read: 'The application(s) shall be supported by a Transport Assessment and Travel Plan including measures for maximising sustainable transport connectivity, minimising the impact of motor vehicles on new residents and existing communities, and actions for updating the Travel Plan during construction of the development. <u>The Transport Assessment shall include consideration of the effect of vehicular and non-vehicular traffic on use of the railway level crossings at Sandy Lane, Yarnton Lane and Roundham.</u></p>	<ul style="list-style-type: none"> • Traffic surveys should be undertaken on Sandy Lane before proposals are included in any release to developers • Agrees with the OSM forecast in Appendix 1 Table 4.1, p.21. • Closure of Sandy Lane would cause massive disruption and is unacceptable to Yarnton residents. • The closure of Sandy Lane to vehicular traffic will be detrimental to the residents of the surrounding villages. The concept of improving the sustainability of this route for use by pedestrians and cyclists is desirable but do not need to be to the detriment of vehicular travel. • A full assessment of the effects to close the level crossing to vehicles should be undertaken now and not be left to the developer. • Dispute the accuracy of the SOCG-98 submitted jointly by Cherwell District Council, Oxfordshire County Council and Network Rail in February 2019 stating without any evidence that Sandy Lane is a 'peak hour rat run'. Recognise the need to make it a safer route, and Yarnton Parish Council should be part of any discussions for its alteration. Unsound, not yet positively prepared. 	<p>PR-D-0082 (B&YGBC) PR-D-0088 (D Hipkiss) PR-D-0091 (Cllr I Middleton) PR-D-0056 (Yarnton PC)</p>	<p>The closure of Sandy Lane was considered at the EIP including detailed discussions of transport evidence and Statement of Common Ground SoCG-98. In his post hearing advice note (PC5) the Inspector stated '<i>I recognise that the allocations, and other factors, will lead to changes to the highway network, like the closure to vehicular traffic of Sandy Lane. However, while such changes might be inconvenient, to some, the impact they would involve is not such that it renders the Council's approach unreasonable, or the Plan unsound.</i>'</p> <p>The Council will ensure there is consistent engagement with Parish Councils in preparing the development briefs. A change to the MMs is not required.</p> <p>Infrastructure providers such as Network Rail and County Council as Local Highway Authority undertake specific consultations when progressing their plans and infrastructure schemes.</p>
<p>Main 105 <i>(P.125; Policy PR8 - Land East of the A44; Point 23)</i></p>	<ul style="list-style-type: none"> • Lacks consideration of the impact on existing dwellings in terms of increased flood risk as a result of adjacent developments 	<p>PR-D-0091 (Cllr I Middleton)</p>	<p>This representation does not directly relate to the proposed Main modification which was made following a representation from the Environment Agency.</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
<p>Amend to read '23. The application shall be supported by a Flood Risk Assessment informed by a suitable ground investigation, and having regard to guidance contained within the Council's Level 2 Strategic Flood Risk Assessment. A surface water management framework shall be prepared to maintain run off rates to greenfield run off rates and volumes, with use of Sustainable Drainage Systems in accordance with adopted Policy ESD7, taking into account recommendations contained in the Council's Level 1 and Level 2 SFRAs. <u>Residential development must be located outside the modelled Flood Zone 2 and 3 envelope.</u>'</p>			
<p>Main 106</p> <p><i>(P.125; Policy PR8 - Land East of the A44; Point 24)</i></p> <p>Amend to read 'The application should demonstrate that Thames Water, Natural England has agreed in principle and the</p>	<ul style="list-style-type: none"> • Requests that the proposed wording of Policy PR8 Point 24 is amended to read: "...in principle that foul drainage from the site will be accepted into the foul drainage network." 	<p>PR-D-0034 (Thames Water)</p>	<p>Whilst officer's do not object to the amended wording, in principle, it is not considered that the change is necessary for soundness.</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
<p><u>Environment Agency have been consulted regarding wastewater treatment capacity and agreement has been reached</u> in principle that foul drainage from the site will be accepted into <u>the drainage its</u> network.'</p>			
<p>Main 109</p> <p><i>(P.125; Policy PR8 - Land East of the A44; New Point)</i></p> <p>Add new point 28 to read '<u>The application shall include a management plan for the appropriate re-use and improvement of soils'</u></p> <p>Re-number subsequent points</p>	<ul style="list-style-type: none"> • Supports modification. 	<p>PR-D-0085 Oxfordshire CC)</p>	<p>Noted</p>
<p>Main 111</p> <p><i>(P.127; Paragraph 5.121)</i></p> <p>Amend to read: 'We are also seeking to enhance the beneficial use of the Green Belt within the site by requiring</p>	<ul style="list-style-type: none"> • Previous commitments to maintaining biodiversity and habitats and informal access to green spaces appear to be 'watered down' 	<p>PR-D-0091 (Cllr I Middleton)</p>	<p>This is a consequential change to other modifications. It does not reduce the requirements for biodiversity habitats and green infrastructure.</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
	<p>improved informal access to the countryside and significant ecological and biodiversity gains primarily through the establishment of publicly accessible informal parkland between the proposed built development and the retained agricultural land to the west. There will also be opportunities for significant ecological and biodiversity gains. The Council's priority will be the creation of a new Local Nature Reserve at the southern end of the site with good access to the primary school and the existing public rights of way.'</p>		
<p>Main 112</p> <p><i>(P.129; Policy PR9 – Land West of Yarnton; Policies Map – Land West of Yarnton)</i></p> <p>Extend residential area to 25.3 hectares Delete Public Access Land Amend Revised Green Belt boundary</p>	<ul style="list-style-type: none"> • Requests confirmation that the revised policy map provides sufficient land to meet Oxfordshire CC's requirements for the school site. 	<p>PR-D-0085 (Oxfordshire CC)</p>	<p>The revised policy map amends the area reserved for the improvement/replacement of playing fields and amenity space for William Fletcher School. The area proposed reflects the requirements set out in the County Council's representations to the Submission Plan (July 2017). OCC's representation to the Main modifications now refers to a revised layout for the school which is a result of discussions</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
<p>Add 24.8 hectares of new green space/parks Add 39.2 hectares of retained agricultural land</p>	<ul style="list-style-type: none"> • Whilst supporting the extension of the residential area the respondent considers it should be extended further as contained in their submission PR122 • Reference is made to evidence base documents PR110, PR108 and PR113b. 	<p>PR-D-0084 (Gerald Eve for Merton College)</p>	<p>between Oxfordshire CC and Merton College only. Officers are concerned that the extended site requested for the primary school extension is not proportionate and therefore contrary to the CIL Regulations. Oxfordshire CC have previously advised that a site of 2.2 ha is required for a new 2FE primary school. However, in this instance when the additional land now being requested (1.8 ha) is added to the existing school site (1.2 ha) the total site area extends to approximately 3 ha. Officers are therefore of the view that in the absence of a detailed justification there is no reason to release more land from the Green Belt above that already proposed by the modifications. Furthermore, having regard to the Council's landscape evidence (PR108) and the requirement for significant engineering works to grade the land it is considered that the extended site would have an unacceptable landscape impact.</p> <p>Policy PR9 of the Submission Plan proposes the construction of 530 dwellings on approximately 16 has of land to the west of Yarnton.</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
	<ul style="list-style-type: none"> • The representation is accompanied by a map showing the amendments sought, which also includes an area safeguarded for further housing to the west. • The revised Green Belt boundary should be adjusted westwards including to accommodate the County Council request in conjunction with William Fletcher Primary School • the green space/park is considered inappropriate and unrelated in scale and kind to the draft allocation and should be replaced with a buffer area (denoted as public access land) and defined edge to the Green Belt with areas and routes accessible to the public. • The Policies Map should be amended as set out in the plans accompanying the representation. If the public open green space area is to be delivered it should be made clear that the Local Nature reserve will be delivered within it. 		<p>In his Advice Note (PC5) the Inspector advised that he had sympathy with the promoter's view argued at the Hearings that a more satisfactory development might be achieved by extending the residential development area westwards. He also suggested that in doing so the Council considers whether some additional homes could be achieved.</p> <p>The Explanatory Note (November 2019) describes in detail the process the Council took in preparing Main Modifications. A sequential consideration of options took place to avoid unnecessary further alterations to the Green Belt boundaries and to ensure that, if required, there were exceptional circumstances for further alteration.</p> <p>A number of key constraints were identified and where necessary additional evidence commissioned. The key constraints included:</p> <ul style="list-style-type: none"> • High and moderate value trees including veteran trees and the presence of important hedgerows situated along field boundaries, which divide the site into smaller parcels. • The need for an appropriate design response in relation to the A44. • Surface water drainage catchments falling towards the low-lying land in the eastern part of the site and the

Modification Number	Comment/Issue	Representation Number	Officer Response
			<p>associated land take for sustainable drainage features (SuDS).</p> <ul style="list-style-type: none"> • Landform rising westwards from the A44 creating level changes to a high point north west of Begbroke. Higher ground parcels form part of the ring of hills forming a key element of Oxford's historic setting and special character. • Absence of field boundaries in the centre of the site • Historic landscape features <p>The Landscape Assessment for the site (CD PR108) concluded that the landscape could accommodate residential development on the lower slopes in the east of the study area, avoiding rising up the steeper mid-slopes, so that the enclosing function of the landform to the lower-lying broad vale would be retained. The westward extent of development should be related to the 75m AOD contour, although the strong vegetation structure to the large central field could accommodate development to about the 78m contour. A substantial green infrastructure for the development and the outer buffer of accessible green space would need to be secured through a development brief and a long-term management plan.</p>

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			<p>The Green Belt Study Addendum (CD PR104) stated that the Submission Plan's proposed western boundary followed, for the most part, existing field boundaries. These boundaries also marked a distinction between areas closer to Yarnton, rated at moderate and moderate-high harm, and land to the west which was rated at high harm. The rising landform and absence of field boundaries in the area into which further settlement expansion is proposed are the reasons for the higher harm rating, but some gradation can be identified. There is a distinction between the more gentle lower slopes on which development is proposed and the steeper hillside beyond, which is more clearly countryside.</p> <p>The Cherwell Green Belt Study (PR40) also noted that the higher ground formed part of the ring of hills that constitutes a key element in Oxford's historic setting, contributing to the preservation of the City's setting and special character (the 4th Green Belt purpose), but that the lower slopes were also significant in this respect.</p> <p>It continued by stating that the change in slope is not dramatic, so the precise location of a new boundary would make little difference in Green Belt terms, but a new</p>

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			<p>Green Belt edge approximating to the lower end of this topography (at around the 75m contour) would nonetheless define an area in which harm to the Green Belt purposes, although greater than that associated with the formerly proposed release, would be lower than the harm associated with the release of the higher slopes.</p> <p>In summary, the extension of the development area further west as advocated by the site promoters is not supported by the Council's evidence.</p> <p>Following the Inspector's Note three alternative schemes were submitted by the site promoters (PR122). All three schemes indicated substantial areas for biodiversity enhancement between retained agricultural land to the west and the residential areas to the east.</p> <p>This area is now reflected in the Council's modifications as 'new green space/parks'.</p> <p>Paragraph 81 of NPPF 1 states that local planning authorities should plan positively to enhance the beneficial use of Green Belt. This policy is continued in NPPF 2. Para 138 of the 2019 Framework also now states that local planning authorities should set out ways in which the impact of removing land from the</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
	<ul style="list-style-type: none"> • Extension of the current Green Belt boundary for PR9 involves encroachment onto countryside and Green Belt assessed as high harm in the LUC Cherwell Green Belt Study. It is not warranted by exceptional circumstances and contrary to the sequential approach set out in the NPPF. • The land proposed to be released from the Green Belt forms an inherently interesting historic landscape, designed by nature and traditional agricultural land use. It is an important heritage asset and is served by two major footpaths, enjoyed by both local residents and tourists. • The deletion of PR10 is supported but the evidence does not support reallocation of dwellings from PR10, a non-Green Belt site to PR9. it is unsound to remove houses from a non-Green Belt site and release further Green Belt to accommodate them. 	<p>PR-D-0067 (CPRE) PR-D-0082 (B&YGBC) PR-D-0091 (Cllr I Middleton) PR-D-0056 (Yarnton PC)</p>	<p>Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.</p> <p>This approach is consistent with that for PR8 which has been accepted by its landowners/promoters. The proposed modifications are therefore justified and in accordance with Government policy.</p> <p>These representations raise similar issues to those made in response to MM 21.</p> <p>Reference should therefore be made to the full response under MM 21 in addition to those made above.</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
	<ul style="list-style-type: none"> • Extension of the Green Belt boundary in PR9 will encroach on to the open and elevated countryside to the west of the A44 and will further weaken the westward boundary of the overall Review Plan area. • Extension of the PR9 boundary into land containing ridge and furrow earthworks beyond the current ancient hedgerow will damage the historic landscape setting. The extent of damage to heritage assets would remain unknown until further fieldwork is undertaken. The irretrievable release of Green Belt cannot be provisional on further research that would in fact follow the release of said Green Belt. • Further release of the Green Belt on PR9 would not accord with Local Plan Strategic Objective 15. • The extension of PR9 as proposed by Main 112 and 113 were deemed 'unacceptable' by the Council in its submission for Matter 7. The evidence now produced to reverse this judgement is unsound. • The extension of the residential area to 25 ha is a massive increase in land take for only 10 additional dwellings. There is no explanation of where the additional agricultural and green space will be located • If site PR9 is to be allocated, the Green Belt boundary should be tightly drawn around the actual development area • The provision of green space and retained agricultural land can be fulfilled whilst retaining land within the Green Belt rather than removing it as the modification proposes 		

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	<ul style="list-style-type: none"> • Do not advise the removal of the land from Green Belt protection and subjecting it to increased population pressure as a result of trampling, littering and damage. The land will become vulnerable to development at a later date and biodiversity will suffer • Table 3 of document PR106 confirms that the Green Belt land proposed to be developed is species rich and that protected / notable species are present in all sites • The proposed modification is considered unjustified as the proposed changes to the Policies Map for site PR9 are not considered the most appropriate. 		
<p>Main 113</p> <p><i>(P.130; Policy PR9 – Land West of Yarnton; Point 1)</i></p> <p>Amend to read, 'Construction of 540 530 dwellings (net) on approximately 25 16 hectares of land (the residential area as shown). The dwellings are to be constructed at an approximate average net density of 35 dwellings per hectare'</p>	<ul style="list-style-type: none"> • Supports the extension of the residential area but considers it should be extended to comprise a larger area, as set out in the respondent's submission PR122, and shown on the plan accompanying the representation. • Policy PR9 should be amended to indicate the site could accommodate more homes as set out in PR122. • The Proposals Map should be amended as shown on the plan accompanying the representation, including an area safeguarded for future homes. • Object to the proposed main modification. The PR9 site should be reduced to 200 homes or deleted as an allocation. • Reference to the Landscape evidence and questioned the possibility of a defensible boundary. 	<p>PR-D-0084 (Gerald Eve for Merton College)</p> <p>PR-D-0069 (Bloombridge)</p>	<p>This representation raises similar issues to those made in response to MM112.</p> <p>Reference should therefore also be made to the full response under MM 112.</p> <p>These representations raise similar issues to those made in response to MM21.</p> <p>Reference should therefore also be made to the full response under MM 21.</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
	<ul style="list-style-type: none"> • Reference to the Transport Assessment Addendum and its lack of justification for the site to be allocated particularly it ranked 42 out of 44 sites. • Extension of the current Green Belt boundary for PR9 involves encroachment onto countryside and Green Belt assessed as high harm in the LUC Cherwell Green Belt Study. It is not warranted by exceptional circumstances and contrary to the sequential approach set out in the NPPF. • The land proposed to be released from the Green Belt forms an inherently interesting historic landscape, designed by nature and traditional agricultural land use. It is an important heritage asset and is served by two major footpaths, enjoyed by both local residents and tourists. • The deletion of PR10 is supported but the evidence does not support reallocation of dwellings from PR10, a non-Green Belt site to PR9. It is unsound to remove houses from a non-Green Belt site and release further Green Belt to accommodate them • Extension of the Green Belt boundary in PR9 will encroach on to the open and elevated countryside to the west of the A44 and will further weaken the westward boundary of the overall Review Plan area. • Extension of the PR9 boundary into land containing ridge and furrow earthworks beyond the current ancient hedgerow will damage the historic landscape setting. The extent of damage to heritage assets would remain unknown until further fieldwork is undertaken. The irretrievable release of Green Belt cannot be 	PR-D-0082 (B&YGBC)	

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	<p>provisional on further research that would in fact follow the release of said Green Belt.</p> <ul style="list-style-type: none"> • Further release of the Green Belt on PR9 would not accord with Local Plan Strategic Objective 15. • The extension of PR9 as proposed by Main 112 and 113 were deemed 'unacceptable' by the Council in its submission for Matter 7. The evidence now produced to reverse this judgement is unsound. 		
<p>Main 114</p> <p><i>(P.130; Policy PR9 – Land West of Yarnton; Point 3)</i></p> <p>Amend to read: 'The provision of 1.6 1.8 hectares of land for use by the existing William Fletcher Primary School to enable potential school expansion within the existing school site and the replacement of playing pitches and amenity space'</p>	<ul style="list-style-type: none"> • Sport England supports the proposed modification. • The increase in proposed area for potential expansion of William Fletcher Primary School is supported but will require consequential modifications to the Green Belt boundary. • Further engagement with the County Council in terms of spatial arrangements being sought would necessitate further development in what is currently shown as Green Belt, including an access road. • Requests amendment: 'The provision of 1.8 hectares of land and financial contributions for use by the existing the expansion of William Fletcher Primary School by 0.5FE to facilitate and create a comprehensive safe, effective and practical 2FE school site to enable potential school expansion within the existing school site and the replacement of playing pitches and amenity space. 	<p>PR-D-0004 (Sport England)</p> <p>PR-D-0084 (Gerald Eve for Merton College)</p> <p>PR-D-0085 (Oxfordshire CC)</p>	<p>Noted</p> <p>These representations raise similar issues to those made in response to MM112.</p> <p>Reference should therefore also be made to the full response under MM 112.</p> <p>The comments of the County Council are noted but the changes are not considered necessary for the soundness of the Plan. The additional land is proposed for replacement playing pitches and amenity space to enable potential school expansion on the existing school site.</p>

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<p>Add a second sentence to point 8 (a) to read: <u>'Minor variations in the location of specific uses will be considered where evidence is available.'</u></p>	<ul style="list-style-type: none"> The words “where evidence is available” should be deleted. Supports modification if the word ‘minor’ is deleted. Yarnton Parish Council should be a consultee and development partner in the delivery of these plans. 	<p>PR-D-0085 Oxfordshire CC)</p> <p>PR-D-0091 (Cllr I Middleton) PR-D-0056 (Yarnton PC)</p>	<p>Officers do not agree that the words ‘where evidence is available’ nor ‘minor’ should be deleted.</p> <p>The Council will ensure there is consistent engagement with Parish Councils in preparing the development briefs. A change to the MMs is not required.</p>
<p>Main 118</p> <p><i>(P.130; Policy PR9 – Land West of Yarnton; Point 8 (b))</i></p> <p>Amend to read: <u>'At least two separate pPoints of vehicular access and egress to and from the A44 with a connecting road between.'</u></p>	<ul style="list-style-type: none"> Suggests amendment to read: <u>'At least two separate points of vehicular access and egress, one of which must be directly onto the A44, to and from the A44'</u> The proposed modification is not considered to be justified The reason for the modification refers to Oxfordshire County Council representation PR-C-0832 but there is no reference within that document to support the proposed change. Main Modification 118 should be deleted and the road layout and principal accesses resolved through the scheme design development and Development Brief process. 	<p>PR-D-0085 Oxfordshire CC)</p> <p>PR-D-0084 (Gerald Eve for Merton College)</p>	<p>This Modification resulted from a County Council formal representation at Pre-submission stage (July 2017) requiring two separate points of access. It is considered that further changes regarding access are more appropriately addressed through the development brief processes.</p> <p>This Modification resulted from a County Council formal representation at Pre-submission stage (July 2017), this change was carried through and submitted in March 2018 to the Inspector for examination alongside all the relevant evidence. Transport matters related to Main 118 and the Plan as a whole were discussed extensively at the Plan’s examination.</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
	<ul style="list-style-type: none"> • More detail needed on these proposals to ensure they do not cause further congestion on the A44 which is likely to be gridlocked anyway as a result of these plans and the Oxford North development. • The requirement of two points of vehicle access onto the A44 rises issues for traffic flow along the A44. • The effects of new junctions and of the traffic flow on the A44 have not been considered. Unsound, not yet positively prepared. 	PR-D-0091 (Cllr I Middleton) PR-D-0056 (Yarnton PC)	It is considered that the comments requesting further changes to Main 118 are more appropriately addressed through the development brief process or at planning application stage in response to site specific planning proposals. Main 118 is proportionate to plan making, it is not intended to replace the Transport Assessments needed at planning application stage.
Main 120 <i>(P.132; Policy PR9-Land West of Yarnton; Point 14)</i> Amend to read 'The application should demonstrate that Thames Water has agreed in principle and the Environment Agency have been consulted regarding wastewater treatment capacity and agreement has been reached in principle that foul drainage from the site will be accepted into the drainage its network.'	<ul style="list-style-type: none"> • Requests that the proposed wording of Policy PR9 Point 14 is amended to read: "...in principle that foul drainage from the site will be accepted into the foul drainage network." • Development on the slopes of Spring Hill will increase the likelihood of flooding and worsen current issues in Yarnton resulting from heavy rain. 	PR-D-0034 (Thames Water) PR-D-0091 (Cllr I Middleton) PR-D-0056 (Yarnton PC)	Whilst officer's do not object to the amended wording, in principle, it is not considered that the change is necessary for soundness. Both Thames Water and the Environment Agency raise no fundamental objections to this proposed allocation.
Main 122 <i>(P.132; Policy PR9 – Land West of Yarnton; New Point)</i>	<ul style="list-style-type: none"> • Supports modification. 	PR-D-0085 (Oxfordshire CC)	Noted

Modification Number	Comment/Issue	Representation Number	Officer Response
<p>Add new point 17 to read '<u>The application shall include a management plan for the appropriate re-use and improvement of soils'</u></p> <p>Re-number subsequent points</p>	<ul style="list-style-type: none"> The levelling and re-distribution of soils at land to the north of the Sanctuary Housing residential home implies a great deal of work with heavy plant Concern raised at the developer's plan (PR122) to level the ground north of the Sanctuary Nursing Home to make a sports field by removing the excavated material from the site altogether. This implies an enormous amount of heavy traffic engaged in an environmentally unfriendly exercise. Unsound, not yet positively prepared. 	<p>PR-D-0091 (Cllr I Middleton) PR-D-0056 (Yarnton PC)</p>	<p>Noted</p> <p>Noted</p>
<p>Main 124</p> <p><i>(P.135 to 137; Woodstock – Paragraphs 5.124 to 5.139)</i></p> <p>Delete paragraphs 5.124 to 5.139.</p>	<ul style="list-style-type: none"> Supports proposed modification 	<p>PR-D-0084 (Gerald Eve for Merton College)</p>	<p>Noted</p>
<p>Main 125</p> <p><i>(P.138 to 144; PR10 – Policies Map – Land south East of Woodstock; Proposals Map)</i></p> <p>Delete Proposals Map and Key</p>	<ul style="list-style-type: none"> Supports proposed deletion of site PR10 and the re-allocation of housing to other sites Supports proposed modification 	<p>PR-D-0075 (Carter Jonas for Manor Oak) PR-D-0084 (Gerald Eve for Merton College)</p>	<p>Noted</p>
<p>Main 126</p>	<ul style="list-style-type: none"> Supports proposed deletion of site PR10 and the re-allocation of housing to other sites. 	<p>PR-D-0075 (Carter Jonas for Manor Oak)</p>	<p>The representations in support of this modification are noted.</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
<p><i>(P.139 to 143; PR10 – Land South East of Woodstock; Policy PR10)</i></p> <p>Delete Policy PR10</p>	<ul style="list-style-type: none"> • Support the deletion of the allocation at site PR10. • The development of PR10 would cause significant harm to the setting of Blenheim Palace World Heritage Site and the Blenheim Villa Scheduled Monument. • The intensification of settlement in the area and the subsequent increase in congestion would place undue stress on the local landscape and setting of Woodstock Conservation Area. • The development of PR10, in-combination with the ‘Land East of Woodstock’, would lead to the merger of Kidlington and Woodstock, with only London Oxford Airport separating the two. • The reallocation of the 410 dwellings set for PR10 to alternative sites in the Green Belt is unnecessary. The 4,400 dwellings identified to meet an ‘unmet need’ for Oxford City is unproven and highly exaggerated given the emergence of the latest OAN identified in the 2018 SHMA. • Supports proposed modification • Supports the deletion of Policy PR10 due to harm to Blenheim Palace WHS and impact on the landscape and setting of Woodstock 	<p>PR-D-0084 (Gerald Eve for Merton College)</p> <p>PR-D-0073 (Woodstock TC)</p> <p>PR-D-0016 (WODC)</p>	<p>The representations in support of this modification are noted.</p> <p>The representations in support of this modification are noted.</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
	<ul style="list-style-type: none"> • All reasonable alternatives have been considered including the scope for a reduced quantum of development on PR10 • Agree to CDC pragmatic approach which addresses the housing shortfall through higher densities and extensions to other existing allocations in the context of exceptional circumstances for development in the Green Belt already having been accepted by the Inspector • Objects to the deletion of allocation PR10 from the Plan and the consequential further release of Green Belt land which is contrary to national policy • Consider PR10 to be a sustainable site which is compliant with the 2012 NPPF and supported by council officers and Historic England • The SA identifies PR10 as a reasonable site option but the significant effects of PR10 (paragraphs 1.22 – 1.34) contains significant errors 	<p>PR-D-0062 (Terence O'Rourke for the Vanbrugh Unit Trust & Pye Homes)</p>	<p>The Council's evidence supporting the submitted plan considered the site to be a reasonable one to consider. The Council's original conclusion on site selection for site PR10 is recorded in the Sustainability Appraisal (CD PR43d, para's 10.23 to 10.36). It was concluded, "The Council considers that the site should be taken forward for residential development albeit with the need to restrict the residential development area". Additionally, it was originally concluded that the effects of development would be acceptable, and that development would contribute to the achievement of sustainable development (CD PR43 Section 10). The site was the only one identified as being appropriate outside the Oxford Green Belt.</p> <p>Having reviewed all written and oral evidence, the Inspector has provided a planning</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
			<p>judgement that allocation of the site would not be sound. He has made it clear that he does not believe “...that the impact on the setting, and thereby the significance of the nearby Blenheim Palace World Heritage Site (WHS) would be unacceptable, considered in isolation.” But, notwithstanding the potential for screen planting, his view is that ‘...the development of the site for housing would represent an incongruous extension into the countryside that would cause significant harm to the setting of Woodstock, and the character and appearance of the area...’.</p> <p>This planning judgement, with the Inspector’s additional concerns about travel distance to Oxford and the setting and significance of the World Heritage Site (also following the consideration of evidence), weighed heavily in the Council’s considerations. The Council presented the Inspector with an alternative proposal for site PR10 to which Historic England had no objection. The Inspector’s judgement was made with this information available to him. The Council is mindful that housing development on adjoining development to the north west is now under construction but the influence of that development (as a West Oxfordshire allocation and planning application approval) was previously considered. The Council is also cognisant of the landscape evidence</p>

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			<p>submitted by West Oxfordshire District Council (Chris Blandford Associates). In its written statement to the Examination (Matter 8 -Written Statement) West Oxfordshire District Council argued that the proposed allocation would, inter alia, have a potential adverse impact on the local landscape and setting of Woodstock.</p> <p>The Council has been conscious of Historic England's position and the fact that, following the publication of the Proposed Submission Plan, no objection was received from ICOMOS. It has also been mindful of the site's non-Green Belt location. However, it is clear that development of site PR10 would comprise a substantial development within close proximity to both Woodstock and the World Heritage Site and would change the local environment through the loss of countryside and the introduction of built development in an otherwise open setting. The SA addendum notes that a reduced and/or less dense PR10 would most likely reduce the area of open greenfield land that would be developed and the potential scope and significance of adverse effects against SA objectives 9 (Historic Environment) and 13 (Efficient Use of Land). However, it noted that the same sensitivities and therefore the potential for significant negative effects still exist as for the original SA of the site. The SA</p>

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			<p>also notes uncertainty as the exact scale, design and layout of a smaller allocation in this location (and any mitigations/enhancements) are unknown. Having regard to all the above considerations, and the fact that the Inspector's concerns relate to the principle of development rather than the quantum or configuration, the Council considered that site PR10 was not suitable for the purpose of preparing main modifications. A re-configuration of the residential area would not overcome the Inspector's concern of development extending into the countryside, causing significant harm to the setting of Woodstock and the character and appearance of the area. Similarly, a reduced number of dwellings on the site would not overcome the Inspector's concerns on travel distance to Oxford and the wider relationship with the World Heritage Site.</p>
<p>Main 131 <i>(P.147; Policy PR11 - Infrastructure Delivery; Point 1(a))</i></p>	<ul style="list-style-type: none"> • Anglian Water Services Limited supports the amended policy wording. 	<p>PR-D-0008 (Anglian Water)</p>	<p>Noted</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
Amend to read 'provide and maintain physical, community and green infrastructure'			
<p>Main 134</p> <p><i>(P.148; Policy PR11 - Infrastructure Delivery; Policy PR11)</i></p> <p>Add new point 4: <u>'4. All sites are required to contribute to the delivery of Local Plan infrastructure. Where forward funding for infrastructure has been provided, for example from the Oxfordshire Growth Board as part of the Oxfordshire Housing and Growth Deal, all sites are required to contribute to the recovery of these funds as appropriate.'</u></p>	<ul style="list-style-type: none"> • Supports modification. 	PR-D-0085 Oxfordshire CC)	Noted
<p>Main 137</p> <p><i>(P.150; Policy PR12a - Delivering Sites and Maintaining Housing Supply; 3rd paragraph)</i></p> <p>Delete the paragraph:</p>	<ul style="list-style-type: none"> • Supports proposed modification. 	PR-D-0014 (Pegasus for Barwood Developments) PR-D-0054 (Turley for Landowner of	Noted

Modification Number	Comment/Issue	Representation Number	Officer Response
<p>Land South East of Kidlington (Policy PR7a – 230 homes) and Land South East of Woodstock (Policy PR10 – 410 homes) will only be permitted to commence development before 1 April 2026 if the calculation of the five year land supply over the period 2021 to 2026 falls below five years.</p>	<ul style="list-style-type: none"> Alternative sites should be considered to allow flexibility and to ensure homes are delivered without further delays. The Moors in Kidlington should be allocated for 300 homes. The site scores well in the Sustainability Appraisal. Request that the duration of the Plan is extended to 2036, bringing it in line with Oxford City’s Local Plan timeframe and allowing a realistic delivery trajectory 	<p>northern parcel of PR7a)</p> <p>PR-D-0069 (Bloombridge)</p> <p>PR-D-0093 (KDW)</p>	<p>This matter was previously discussed at the Hearing and the Council is content that the Plan provides sufficient flexibility. The proposed housing trajectory takes into account the Planning Performance Agreements and Development Briefs for the proposed sites which have been agreed with the site promoters, and the process is twin-tracked with the Plan adoption enabling faster submission of planning applications.</p> <p>The Plan period up to 2031 reflects the time period covered in the Cherwell adopted Local Plan Part 1 (2011-2031). In addition, the agreed Oxfordshire Housing and Growth Deal with central Government commits to deliver 100,000 homes up to 2031.</p>
<p>MM 138</p> <p><i>(P.150; Policy PR12a - Delivering Sites and Maintaining Housing Supply; 5th Paragraph)</i></p> <p>Amend to read: 'Permission will only be granted for any of the allocated sites if it can be</p>	<ul style="list-style-type: none"> The alteration to this delivery Policy has been requested by the site owners. Site owners are obviously concerned that the relocation of the golf course will hamper delivery of the site. A new golf course will take 5-10 years to deliver. PR6b can therefore not contribute to delivering a continuous 5-year housing supply – or indeed any housing development within the plan period. 	<p>PR-D-0063 (GreenWay Oxfordshire)</p>	<p>This modification has been proposed to provide certainty that a five year housing land supply can be achieved. It is essential that the policy provides that five year housing land supply is measured against the trajectory, rather than an annualised target, because the latter could lead to a shortfall in five year supply, which in turn could lead to unplanned and unsustainable development. National</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
<p>demonstrated at application stage that they will <u>contribute in delivering</u> a continuous five year housing land supply on a site specific basis (i.e. measured against the <u>local plan housing trajectory allocation for the site</u>). <u>This will be achieved via the Delivery Plans required for each strategic development site.</u></p>	<ul style="list-style-type: none"> • Site PR6b should be deleted from the allocations. • Objection raised to the proposed modification as the requirement for a delivery plan and sites to be measured against the housing trajectory is unsound, in that it is neither justified nor effective. • The proposed text conflicts with Main 137 which removes the phasing restriction for site PR7a • The proposed amended text should be deleted in its entirety. <p>Objection raised to the amended wording proposed:</p> <ul style="list-style-type: none"> • The purpose of the modification and how it will be applied is unclear: what is a “continuous five-year land supply”? • the previous phasing restriction on site PR7a elsewhere in the Plan is proposed to be removed (Main 137), but this modification seems to be introducing a default phasing restriction on delivery despite the urgent housing need • The inter-relationship between Main 81, Main 137, Main 138 and Appendix 3 trajectory for site PR7a is confusing with the potential to delay much needed housing on a site which is arguably the least constrained of all the allocations • Main 137 removes the phasing restriction but MM Appendix 3 proposes no change to delivery on site PR7a, and Main 81 and 138 both reference permission only being granted if demonstrating delivery of “a 	<p>PR-D-0014 (Pegasus for Barwood Developments)</p> <p>PR-D-0054 (Turley for Landowner of northern parcel of PR7a)</p>	<p>policy both in the 2012 NPPF (para 47) and the 2019 NPPF (para 73) is expressly supportive of this approach of policies setting a housing trajectory.</p> <p>This modification is also required to ensure consistency with the site allocation policies (Main Mods 57, 67, 94, 110, 123).</p> <p>Each development site is required to have a Delivery Plan in the interest of maintaining a five-year housing supply and the Plan’s housing trajectory as a whole.</p> <p>The proposed housing trajectory (Main Mod 146) demonstrates a 5.3 year of housing supply.</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
	<p>continuous five year housing land supply (i.e. measured against the local plan housing trajectory)”</p> <ul style="list-style-type: none"> The modification is considered unsound as it is neither positively prepared, justified, effective, nor consistent with national policy. A potential solution would be to amend the trajectory in Appendix 3 to indicate delivery at PR7 commencing in 2021/22. 		
<p>Main 139</p> <p><i>(P.151; Policy PR12b - Sites Not Allocated in the Partial Review; Point (3))</i></p> <p>Amend as follows: 'the site has been identified in the Council's Housing and Economic Land Availability Assessment as a potentially developable site'</p>	<ul style="list-style-type: none"> Little explanation as to why this amendment has been made other than to act as clarification to the landowners 	PR-D-0091 (Cllr I Middleton)	This modification is proposed for clarification purposes only.
<p>Main 146</p> <p><i>(P.162; Appendix 3 – Housing Trajectory)</i></p> <p>Update housing trajectory as indicated on revised trajectory attached</p>	<ul style="list-style-type: none"> The expected delivery of homes during 2021/22 is now impossibly ambitious, and this combines with a lack of certainty on infrastructure timing and delivery. E.g. the A44 bus lane. The housing delivery schedule suggests a period of development going on for 9 years which is far too long a period to endure the disruption and blight that will be associated with the building works. The new homes should be built site by site. 	<p>PR-D-0069 (Bloombridge)</p> <p>PR-D-0091 (Cllr I Middleton)</p> <p>PR-D-0056 (Yarnton Parish Council)</p>	This matter was previously discussed at the Hearing and the Council is content that the Plan provides sufficient flexibility. The proposed housing trajectory takes into account the Planning Performance Agreements and Development Briefs for the proposed sites which have been agreed with the site promoters, and the process is twin-tracked with the Plan adoption enabling faster submission of planning applications.

Modification Number	Comment/Issue	Representation Number	Officer Response
	<p>Objection raised to the trajectory in Appendix 3 for site PR7a:</p> <ul style="list-style-type: none"> It is unsound as it is not effective, justified, positively prepared nor consistent with national policy It runs contrary to the intent of MM Main 137 which removes the previous phasing restriction Appendix 3 should be amended to indicate that site PR7s delivers housing from 2021/22 onwards 	<p>PR-D-0014 (Pegasus for Barwood Developments)</p>	<p>Each development site is required to have a Delivery Plan in the interest of maintaining a five-year housing supply and the Plan's housing trajectory as a whole.</p> <p>The proposed housing trajectory demonstrates a 5.3 year of housing supply. The proposed modifications help to provide certainty that a five year housing land supply can be achieved. As stated above, it is crucial and in accordance with national policy (para 47 of the 2012 NPPF and para 73 of the 2019 NPPF) for the plan to have a housing trajectory.</p>
<p>Main 147 <i>(P.163-182; Appendix 4 – Infrastructure Schedule)</i> Update infrastructure schedule (see attached updated schedule)</p>	<ul style="list-style-type: none"> Sport England supports IDP projects 30, 51, 52, 60, 61, 62, 63, 64, 65, and 66. <p>Objection raised to Appendix 4:</p> <ul style="list-style-type: none"> There is a lack of clarity with many provisions as to which site allocations are to fund which pieces of infrastructure, how the division of funding is being determined and how any equalisation between funding partners is being assessed, and therefore whether this aspect of the Plan is compliant with the deliverability aspect of NPPF 34 Where funding is shown as coming from “private sector developers” it should be made clear if this is predominantly or exclusively from a specific site. Similarly, is all development in Cherwell expected to contribute to such infrastructure or solely those schemes promoted through the Partial Review? 	<p>PR-D-0004 (Sport England)</p> <p>PR-D-0014 (Pegasus for Barwood Developments)</p>	<p>Noted</p> <p>The Plan's Infrastructure Schedule (including modification Main 147) is proportionate to plan making. The plan process to date has helped identify infrastructure, costs and means of funding and delivery in compliance with PPG and NPPF for plan making. This process is not intended to replace infrastructure planning at development brief and planning application stages. As the Plan progresses to adoption, infrastructure monitoring and delivery will form part of the Council's yearly Infrastructure Delivery Plan Updates and AMR reporting informed by the latest position from infrastructure providers</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
	<ul style="list-style-type: none"> • The appendix is considered unsound as it is neither effective, justified or consistent with national planning policy, and needs substantial review to provide certainty and clarity. • Suggests additional modification to line 48 (formally 32) of the Infrastructure Schedule: ‘Provision of blue corridors for public open space / recreation / green infrastructure within those areas of the site in FZ 3. • Suggests additional modification to line 51 (formally 35) of the Infrastructure Schedule: ‘Sports hall at PR8 Secondary School for that can accommodate multi shared community use / community service delivery – one additional 4 court sports hall to Sport England specification 34.5 x 20 x 7.5 (690 sqm). • Need to ensure that infrastructure projects are fully planned, costed and funded before houses are built. Failure could lead to serious adverse impacts for current and future residents. • Yarnton Parish Council need to be involved and consider the Plan will be more positively prepared and effective if their comments are noted and included. 	<p>PR-D-0085 Oxfordshire CC)</p> <p>PR-D-0056 (Yarnton PC) PR-D-0082 (B&YGBC) PR-D-0083 (CDWA) PR-D-0091 (Cllr I Middleton)</p>	<p>and stakeholders. Infrastructure provision was discussed at the Local Plan hearings including the content and explanations provided in the Council’s Delivery Topic Paper (PR100) which details compliance with NPPF and makes clear the schedule is a ‘live’ document. The Plan and its proposals are informed by viability assessments (documents PR49, PR100 and PR111) in compliance with the NPPF.</p> <p>The County Council comments for schemes 32 and 35 of Main 147 are noted. It is considered these changes are not necessary for soundness and are more appropriately addressed through the development brief process.</p> <p>Refer to detailed response to MM 147 and Transport evidence.</p> <p>The Council will ensure there is consistent engagement with Parish Councils in preparing the development briefs. A change to the MMs is not required.</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
	<ul style="list-style-type: none"> • The closure of Sandy Lane to vehicular traffic will be detrimental to the residents of the surrounding villages. The concept of improving the sustainability of this route for use by pedestrians and cyclists is desirable but do not need to be to the detriment of vehicular travel. • The inclusion of a bus gate in Kidlington raises a number of questions regarding its operation, the impact on local roads and the impact on emissions and air quality. • Agrees that Sandy Lane should be kept open for pedestrians and cyclists but this shouldn't be to the detriment of vehicular use of Sandy Lane. It is an important road link between local villages. Improving cycle and pedestrian access alongside maintaining vehicular access would be welcomed. • The removal of planned bus lanes is unsound as ensuring efficient and reliable bus journey times both into and out of Oxford is essential for delivery of the sustainable transport plan. • Main 147 makes no reference to inclusion of a northbound bus lane on the A44 between Cassington Road and Loop Farm. This is the most heavily congested stretch of the A44. • It is not clear how the removal of the pedestrian / cycle bridge and bus priority at Kidlington Roundabout on the A4260 supports the soundness of the transport strategy and desire to encourage walking and cycling. 		<p>Regarding Sandy Lane, bus gate, bus lanes and access to site PR7b please refer to detailed response to MM 147 and Transport evidence.</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
	<ul style="list-style-type: none"> • Access from PR7b onto an already congested roundabout needs to be planned and fully modelled prior to the release of this site from the Green Belt. • The removal of sustainable travel improvements on the A44 corridor to provide access to Woodstock is unsound. • The notion the canal can be a commuter route into Oxford is unsound. Protection measures including a dark canal corridor (Note 59) would render the towpath as only being suitable for recreational use due to the long periods where it will be too dark for safe usage. • Requests deletion of reference to Education and Skills Funding Agency as a source of funding. 		<p>Comment on Canal protection is noted, the Plan's Appendix 6 – Thematic Maps indicates 'strategic' and 'Other key cycle routes' linking the Plan's area with Oxford and other locations. Policy PR4a Sustainable Transport notes the provision of a Super Cycle way along the A4260 and provision of new and enhanced cycling routes into Oxford. There are a number of cycling routes which will have different functions. Transport including cycling provision was discussed extensively at the Local Plan hearings. MM147 responds to Canal protection without detriment to the Plan's cycling provision.</p> <p>County Council requests deletion of ESFA reference. The Infrastructure schedule reflects opportunities raised by the ESFA at Proposed Submission Stage (PR-C-0806). The infrastructure schedule is a live document not intended to replace the stages of infrastructure planning work at development brief and planning application stages which will inform infrastructure monitoring an update. A change to the MMs is not required.</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
	<ul style="list-style-type: none"> Yarnton and Begbroke Parish Councils should be involved and consulted in the update of the Infrastructure Schedule. There should also be consultation with Cycle UK, Cyclox, social services, private carer organisations, Clinical Commissioning Groups (OCCG), GPs and other health service providers 		<p>Yarnton and Begbroke Parish Councils' comments are noted. The Council's Duty to Cooperate Statement and its Addendum (PR 90 and PR115) detail the Council's engagement with stakeholders including OCC, OCCGG and GP practices to inform the Plan's preparation. Infrastructure Schedule is not intended to replace the stages of infrastructure planning work at development brief and planning application stages. As the Plan progresses to adoption, infrastructure monitoring and delivery will form part of the Council's yearly Infrastructure Delivery Plan Updates and AMR reporting informed by the latest position from infrastructure providers and stakeholders.</p> <p>The Council will ensure there is consistent engagement with Parish Councils in preparing the development briefs. A change to the MMs is not required.</p>
<p>Main 147 <i>(Infrastructure Schedule Item 80)</i></p>	<ul style="list-style-type: none"> The indicative figure for a replacement golf course of £4m is too low. The cost would be no less than £10m. Yarnton Parish Council needs to be involved in these plans. 	<p>PR-D-0063 (GreenWay Oxfordshire) PR-D-0056 (Yarnton Parish Council)</p>	<p>As acknowledged in the representation these are 'indicative' figures only.</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
Main 147 <i>(Infrastructure Schedule Item 82)</i>	<ul style="list-style-type: none"> This project which is the 'Retention of c3 ha of land in agricultural as part of PR6a was, it is believed, put in place to protect far reaching views from Cutteslowe Park over the Cherwell Valley. It is requested that this aim be reflected in the Policy 'Main aim' by policy rewording. 	PR-D-0070 (Harbord Road Area Residents Assoc)	The points raised in this representation have been noted but they are not directly related to the proposed modification.
General (Policy PR7a Map)	<ul style="list-style-type: none"> Supports proposed modification 	PR-D-0014 (Pegasus for Barwood Developments)	Noted
General PR7a – Extension of site	<ul style="list-style-type: none"> this proposal is inappropriate and excessive, both in size and location; area PR7a, in the parish, has had its housing allocation almost doubled, this further increases concerns about traffic, pollution etc; an increased allocation to other adjacent areas further exacerbates issues with reduction of the green gap between Oxford and Kidlington; the current burial site allocation will not be sufficient for future use with the increase in housing; the increase in allocation for housing in area PR7a significantly reduces the area allocated to sports provision and green space; the potential Oxford to Cambridge Expressway along the route of the A34 would have significant noise and pollution effect on PR7a's extended site. 	PR-D-0086 (Gosford and Water Eaton PC)	Whilst acknowledging the concerns expressed by Gosford and Water Eaton PC officers consider that in the context of housing need and the plan's strategy, additional Green Belt release at site PR7a (10 hectares) can be justified while retaining a significant, albeit narrower, gap (11.5 hectares) to the A34 and the achievement of policy objectives for green infrastructure and sport and recreation. The Council's evidence demonstrates that additional development would be acceptable and contribute to the achievement of sustainable development. In relation to the concerns raised regarding the potential Oxford-Cambridge Expressway, Government has yet to announce its preferred route. The Partial Review requires the provision of 0.7 hectares of land within the developable area of site PR7a for an extension to Kidlington Cemetery. This is considered sufficient to meet the need resulting from the changes

Modification Number	Comment/Issue	Representation Number	Officer Response
			<p>proposed to site PR7a. This matter can be further explored as part of the development brief process.</p> <p>Reference should also be made to the substantive officer response to MM 19 above.</p>
<p>General- Infrastructure Capacity site PR6a Land East of Oxford Road</p>	<p>Thames Water Utilities updated infrastructure comments indicate:</p> <ul style="list-style-type: none"> • Upgrades to water supply network infrastructure and a phasing plan may be required • Wastewater network may require upgrades to the existing drainage infrastructure • A drainage strategy detailing foul and surface water strategies will be required 	<p>PR-D-0034 (Thames Water)</p>	<p>The Water Cycle Study Addendum (PR105) did not assess the impact of the changes to the allocation as being significant and indicates:</p> <ul style="list-style-type: none"> • Waste Water Treatment Works (Oxford): Pumping station or pipe size may restrict growth, or non-sewered areas, where there is a lack of infrastructure; a pre-development enquiry is recommended before planning permission is granted • Wastewater network connection: Infrastructure upgrades will be required
<p>General- Infrastructure Capacity site PR6b Land West of Oxford Road</p>	<p>Thames Water Utilities updated infrastructure comments indicate:</p> <ul style="list-style-type: none"> • Upgrades to water supply network infrastructure and a phasing plan may be required • Wastewater network may require upgrades to the existing drainage infrastructure • A drainage strategy detailing foul and surface water strategies will be required 	<p>PR-D-0034 (Thames Water)</p>	<p>The Water Cycle Study Addendum (PR105) did not assess the impact of the changes to the allocation as being significant and indicates:</p> <ul style="list-style-type: none"> • Waste Water Treatment Works (Oxford): Pumping station or pipe size may restrict growth, or non-sewered areas, where there is a lack of infrastructure; a pre-development enquiry is recommended before planning permission is granted

Modification Number	Comment/Issue	Representation Number	Officer Response
			<ul style="list-style-type: none"> Wastewater network connection: Infrastructure upgrades will be required
<p>General- Infrastructure Capacity site PR7a Land South East of Kidlington</p>	<p>Thames Water Utilities updated infrastructure comments indicate:</p> <ul style="list-style-type: none"> Upgrades to water supply network infrastructure and a phasing plan may be required Wastewater network may require upgrades to the existing drainage infrastructure Development could potentially drain to Oxford STW or Cassington STW depending on the point of connection. All development in the Kidlington area going ahead may be a cause for concern 	<p>PR-D-0034 (Thames Water)</p>	<p>The Water Cycle Study Addendum (PR105) did not assess the impact of the changes to the allocation as being significant and indicates:</p> <ul style="list-style-type: none"> Waste Water Treatment Works (Oxford): Pumping station or pipe size may restrict growth, or non-sewered areas, where there is a lack of infrastructure; a pre-development enquiry is recommended before planning permission is granted Wastewater network connection: Infrastructure upgrades will be required
<p>General- Infrastructure Capacity Land off Oxford Road Kidlington</p>	<p>Thames Water Utilities updated infrastructure comments indicate:</p> <ul style="list-style-type: none"> No concerns with regard to waste water networks in relation to the development. Additional details of the development would be required to undertake a more detailed assessment of impact. All development in the Kidlington area going ahead may be a cause for concern. 	<p>PR-D-0034 (Thames Water)</p>	<p>The Water Cycle Study Addendum (PR105) did not assess the impact of the changes to the allocation as being significant and indicates:</p> <ul style="list-style-type: none"> Waste Water Treatment Works (Oxford): Pumping station or pipe size may restrict growth, or non-sewered areas, where there is a lack of infrastructure; a pre-development enquiry is recommended before planning permission is granted

Modification Number	Comment/Issue	Representation Number	Officer Response
			<ul style="list-style-type: none"> Wastewater network connection: Infrastructure upgrades will be required
<p>General- Infrastructure Capacity site PR8 Land east of the A44</p>	<p>Thames Water Utilities updated infrastructure comments indicate:</p> <ul style="list-style-type: none"> Upgrades to water supply network infrastructure and a phasing plan may be required Strategic drainage infrastructure is likely to be required to ensure sufficient capacity in the wastewater network Development could potentially drain to Oxford STW or Cassington STW depending on the point of connection. Development would require a strategic solution and all development in the Kidlington area going ahead may be a cause for concern. 	<p>PR-D-0034 (Thames Water)</p>	<p>The Water Cycle Study Addendum (PR105) indicates:</p> <ul style="list-style-type: none"> Waste Water Treatment Works (Cassington): Pumping station or pipe size may restrict growth, or non-sewered areas, where there is a lack of infrastructure; a pre-development enquiry is recommended before planning permission is granted Wastewater network connection: Infrastructure upgrades may be required
<p>General- Infrastructure Capacity site PR9 Land West of Yarnton</p>	<p>Thames Water Utilities updated infrastructure comments indicate:</p> <ul style="list-style-type: none"> Upgrades to water supply network infrastructure and a phasing plan may be required Strategic drainage infrastructure is likely to be required to ensure sufficient capacity in the wastewater network Development could potentially drain to Oxford STW or Cassington STW depending on the point of connection. Development would require a strategic solution and all development in the Kidlington area going ahead may be a cause for concern. 	<p>PR-D-0034 (Thames Water)</p>	<p>The Water Cycle Study Addendum (PR105) did not assess the impact of the changes to the allocation as being significant and indicates:</p> <ul style="list-style-type: none"> Waste Water Treatment Works (Oxford): Pumping station or pipe size may restrict growth, or non-sewered areas, where there is a lack of infrastructure; a pre-development enquiry is recommended before planning permission is granted

Modification Number	Comment/Issue	Representation Number	Officer Response
General	<ul style="list-style-type: none"> • Consider the Plan to be unsound as it is unnecessary and unsustainable. • 4000 homes are far too many. • Focus on one Green Belt site if there is a justified need. • Review of Oxford’s actual housing need based on fact and figures. • Removal of influence of the building industry in planning applications. • New homes generate extra traffic. The local system is already severely over stretched and is generating too much pollution which damages the health of local children. • The Council has not met its obligation to hold an effective consultation as ordinary members of the public cannot make their representations through the unhelpful system. Both the planning jargon and the requirement for comments to be made against specific modification numbers results in ordinary members of the public being effectively shut out from the commenting process. • Concerned about traffic and flooding and how the proposed developments will affect Yarnton residents and communities downstream • Yarnton Parish Council expects new development to match the standards in their Climate Emergency Resolution • Requests additional factual update at paragraph 3.67, final sentence to read: ‘The final route is expected to 	<p>PR-D-0052 (F Gibson) PR-D-0056 (Yarnton PC) PR-D-0095 (S Morgan)</p>	<p>Whilst the strength of feeling and concerns raised in these representations is fully understood they do not raise material issues that have not already been debated at length by all parties during the hearing sessions.</p> <p>They do not specifically relate to the Schedule of proposed Main Modifications.</p>

Modification Number	Comment/Issue	Representation Number	Officer Response
	open new links from Oxford and Oxford Parkway to Milton Keynes and Bedford by the mid 2020's 2019 and onto Cambridge in due course'.	PR-D-0085 Oxfordshire CC)	There is no objection to this factual update which can be drawn to the Inspector's attention.
General	<ul style="list-style-type: none"> • Site promotion – Land at number 42 and to the rear of 30-40 Woodstock Road East. 200 homes on 4.39ha at 45 dph. Brownfield site within the Green Belt. 	PR-D-0061 (RPS for Mr R Davies)	This is not a valid objection as is does not specifically relate to the Schedule of Proposed Main Modifications.
General	<ul style="list-style-type: none"> • Site promotion - The Moors in Kidlington. 300 homes. The site scores well in the Sustainability Appraisal. • The Plan departs from its terms of reference, notably on sustainability and the associated methodology for the Green Belt review, as described by LUC. • The Plan lacks sufficient flexibility in the availability of alternative or safeguarded sites to respond to deliverability problems, notably in relation to the A44 Corridor Strategy. • The Plan needs to be more flexible to provide for continuing and emerging needs for housing and employment. • Affordable housing at the PR8 site is unclear due to the University not wanting to make any provision. 	PR-D-0069 (Bloombridge)	This is not a valid objection as it does not specifically relate to the Schedule of Proposed Main Modifications.
General	<ul style="list-style-type: none"> • Site promotion – Land at Frieze Farm. 220 homes. • The site is compared against PR7a in light of the landscape and Green Belt evidence. The site has definitive boundaries. 	PR-D-0081 (Turnberry for Exeter College)	This is not a valid objection as it does not specifically relate to the Schedule of Proposed Main Modifications.
General	<ul style="list-style-type: none"> • Site promotion – 14-16 Woodstock Road. 50 homes. • Supports the strategy overall and the need for Green Belt release to help meet Oxford's unmet housing need. 	PR-D-0087 (Edgars for Mr & Mrs Tomes)	This is not a valid objection as it does not specifically relate to the Schedule of Proposed Main Modifications.

Modification Number	Comment/Issue	Representation Number	Officer Response
	<ul style="list-style-type: none"> Supports the proposed release of land from the Green Belt Policy PR3(a). 		

Modification Number	Comment/Issue	Representation Number	Officer Response
Main 147 and Transport evidence	Detailed points on adequacy of transport evidence and the Infrastructure schedule	PR-D-0083 (CDWA)	See below
<p>The reiteration of CDWA evidence given at the examination is noted, however the Inspector’s Advice Note (document PC5) recognises the potential inconvenience of proposed changes to the highway network, such as the closure of Sandy Lane to through vehicular-traffic. This was discussed during Local Plan hearings in February 2019 and the impact of such changes was not considered by the Inspector to render CDC’s approach unreasonable, or the Plan unsound.</p> <p>On the specific reference to frequency of bus service S3 (A44), in addition to regular 3 services per hour the S3 also provides 4 buses between Oxford and Yarnton/Begbroke within an hour at key time periods. This provides a high-frequency service linking these locations and Oxford at key commuting times.</p> <p>The Council disagrees with the representation’s assertion that PR8 would have ranked similarly to PR9 in ITP’s assessment (document PR52) if it was not for the above inaccuracies. Transport evidence including the ranking of sites (and specifically the reason for the scoring of PR9 which due to its size which distances its centroid from the existing network) was extensively debated at the Local Plan hearings.</p> <p>Comments on cycling and distances to employment locations are noted. Cycling distances were also debated extensively at the Local Plan hearings. Further transport evidence in addition to Transport Assessment (PR52) and Transport Topic Paper (PR102) was provided in a Transport Technical Note (document HEAR 1) specifically addressing cycling and accessibility to Oxford jobs from the allocated sites amongst other matters.</p>			

The transport assessment remains robust, its methodology is proportionate to the Plan and is applied consistently to all sites assessed.

The Council disagrees with the perceived Transport Assessment Addendum's erroneous representation of the A44 corridor bus links to Banbury, Woodstock and Oxford. The Transport Assessment Addendum (PR109) Table 3-1: 'Transport characteristics, opportunities and constraints' reflects the opportunities of existing and planned infrastructure and the alignment of the Plan with the Local Transport Plan (LTP). The LTP refers to strategic inter-urban bus network and shows the importance of the A44 and A4260 for high-speed, high-frequency services and its strategic importance for connections with Banbury – Oxford and/or Witney – Woodstock – Kidlington

Regarding comments on the deletion of public transport schemes: All transport schemes needed for modelling the corridors into Oxford City centre are detailed in the Transport Assessment (PR52) and were discussed in detail at the Local Plan examination. The Council's infrastructure schedule includes those schemes which require interventions within Cherwell District, it does not imply that all the transport highways schemes along this or other corridors planned for in the Local Transport Plan, Oxfordshire Infrastructure Strategy and Growth Deal whether in Cherwell District, Oxford City or West Oxfordshire (and their Local Plans) will not be addressed. Scheme 6 of the Infrastructure schedule reflects bus lane improvements on the A44 corridor. North bound and south bound lane schemes on the A44 in Cherwell are covered in Scheme 6a in one single scheme (previously split into two).

On the reference to 'absence of expected journey times from sites PR8 and PR9' in the Transport Assessment Addendum (PR109): the journey times expected from the proposed allocations are detailed in the Transport Technical Note (document HEAR 1) and re-presented in Appendix 2 of the Transport Assessment Addendum.

The Council disagrees with the perceived inaccurate representation of the facts in the Transport Assessment Addendum conclusion. The Addendum clearly states in para 3.15 that the proposed reallocation of dwellings resulting from the deletion of site PR10 from the Plan is expected to have a positive effect upon overall levels of road traffic (and associated congestion at peak times) that have been forecast to result from the allocation of 4,400 homes being considered.

Oxfordshire County Council confirms in the Transport Assessment Addendum that 'the proposed redistribution will require minimal changes to the package of transport improvements developed to support the Local Plan, and Policy PR10-specific requirements can be removed from the Infrastructure Schedule.'

The Inspector's preliminary advice reaches a view on transport strategy having considered all evidence presented. The purpose of the Transport Assessment's addendum is to assess the potential impact of the modifications proposed and concludes that overall it reduces the transport impact previously forecasted for the allocations previously assessed.

The Transport evidence (documents PR52, PR102, HEAR 1 and PR109) provides a proportionate evidence base informing the Plan and responds to the Local Plan examination process in accordance with national policy and Planning Practice Guidance on 'Transport evidence bases in plan making and decision taking'. The Plan's Transport evidence and infrastructure schedule are not intended to present fully-worked highways solutions or to replace the Transport Assessments needed at planning application stage. The Local Plan process has been informed by an assessment of transport impacts in collaboration with Oxfordshire County Council and is consistent with the approach taken for the adopted Cherwell Plan and other Oxfordshire Plans.

The proposed modifications do not result in a different number of dwellings (4,400) or new growth locations. The purpose of the Transport Assessment Addendum (PR109) is not to repeat previous evidence but to anticipate the impact of proposed revisions to site allocations in terms of sustainable transport and highways considerations. The Addendum provides a proportionate and robust means to anticipate the impact the proposed Main Modifications.

Infrastructure planning is an iterative and collaborative process with infrastructure providers and other stakeholders.

The planning process to date has helped identify infrastructure, costs and means of funding and delivery as per the PPG and NPPF guidance. The Plan and its proposed modifications are supported by a schedule of infrastructure informed by the schemes and interventions sought by the relevant infrastructure providers including Oxfordshire County Council as Local Highways Authority. Infrastructure planning including identification of bus gates or other project-specific measures is a continuous process which will continue through more detailed planning stages such as the preparation of site development briefs. Upon plan adoption there will be yearly monitoring of infrastructure planning and provision by infrastructure providers.

Representations to the Sustainability Appraisal Addendum		
Comment	Respondent(s)	Response
<ul style="list-style-type: none"> In certain respects, promoters support the findings of the SA in relation to sites PR7a, PR9 and proposed safeguarded land at PR3(c). 	<p>Gerald Eve LLP for Merton College (PR-D-0084)</p> <p>Turley for the landowner land at south east Kidlington (PR-D-0054)</p> <p>Edgars for Mr and Mrs Tomes (PR-D-0087)</p>	Noted.
<ul style="list-style-type: none"> The sustainability appraisal and the policy conclusions based on it are biased and flawed. The Council did not properly consider the option of not maintaining the PR10 allocation or of waiting until Oxford's housing need is tested and 	<p>Kidlington Development Watch (PR-D-0093)</p>	<p>The legal requirements for SA (and SEA) have been met. The SA takes account of NPPF1 (2012) and government guidance on SA. The Inspector has not raised any concerns with the SA in his advice note. The Council considers the SA is comprehensive and proportionate.</p>

<p>established. It has not acted to prevent further incursion into the Green Belt or to protect the spatial separation and integrity of our communities. If, as the sustainability appraisal update concludes, further incursion into the Green Belt is the only viable option then it can, and should, decline to provide the 410 homes.</p>		<p>In his Advice Note the Inspector considers that the 4,400 homes proposed provides a sound basis for the Plan. The 2017 SA Report (PR43) included an appraisal of providing 4,400 homes and alternatives.</p> <p>The 2019 SA Addendum (PR113b) concludes that although there will be negative effects associated with the reallocation of the 410 homes from PR10 to allocation Policies PR6a, PR6b, PR7a, PR7b and PR9, overall, the significance of these adverse effects has not changed from those already identified through the SA of the original number of homes allocated at each location. SA Addendum Appendix 1, setting out the additional evidence gathered to establish the likely effects of the redistribution also supports this.</p>
<ul style="list-style-type: none"> • It is not sufficient, on grounds of sustainability, to proceed through Major Modifications alone without reassessment of the Plan as a whole, especially given the high threshold for release of Green Belt. • The PR9 site is not considered to be sustainable as it was ranked 42 out of 44 sites assessed by ITP. The site should be reduced in size or deleted from the Plan. Given such poor performance, especially given these transport metrics would directly contribute to the rating of the site in the Sustainability Appraisal, it is not explained why PR9 was selected (nor indeed how this analysis led to the selection of Area A over the other identified areas). 	<p>Begbroke and Yarnton Green Belt Campaign (PR-D-0082)</p>	<p>In his Advice Note the Inspector considers that the 4,400 homes proposed provides a sound basis for the Plan. His preliminary findings indicate the approach of locating the housing and infrastructure required as close as possible to Oxford, along the A44 and A4165 transport corridors is an appropriate strategy. The Council's consideration of reasonable options for preparation of the Proposed Submission Plan is set out in sections 7, 8, 9 and 10 of the 2017 SA Report (PR43).</p> <p>The Council's reasons for selecting sites, including PR9, is set out in Chapter 10 of the 2017 SA Report (PR43) and the reasons for the Council's approach to the main modifications (including in respect of the PR9 allocation) is set out in the Council's 2019 Explanatory Note and SA Addendum (PR113b). Transport evidence including the ranking of sites and specifically the reason for the scoring of PR9 (due to its size, which distances its centroid point</p>

		<p>from the existing network) was extensively debated at the examination. The sites selected for inclusion in the Plan were considered to be the most suitable for meeting the Plan’s vision and objectives and achieving sustainable development.</p>
<ul style="list-style-type: none"> • The SA identifies PR10 as a reasonable site option. • The SA contains significant errors. The residential part of the allocation is not within the setting of the World Heritage Site. The effects on the historic environment are not uncertain and they are not significantly negative. The clear and significant public benefit has been completely overlooked. • The landscape evidence referred to in the SA is incorrect in its assessment of potential impacts and out of date. • The revised SA does not support the deallocation of PR10 in favour of other options and objection is raised to the removal of site PR10. 	<p>Terence O’Rourke Ltd for Vanbrugh Unit Trust and Pye Homes (PR-D-0062)</p>	<p>Having reviewed all written and oral evidence, the Inspector has provided a planning judgement that allocation of the site would not be sound. He has made it clear that he does not believe “...that the impact on the setting, and thereby the significance of the nearby Blenheim Palace World Heritage Site (WHS) would be unacceptable, considered in isolation.” But, notwithstanding the potential for screen planting, his view is that ‘...the development of the site for housing would represent an incongruous extension into the countryside that would cause significant harm to the setting of Woodstock, and the character and appearance of the area....’.</p> <p>The Council’s consideration of reasonable options for preparation of the Proposed Submission Plan is set out in sections 7, 8, 9 and 10 of the 2017 SA Report (PR43). All options have been subjected to SA using the assumptions set out in Appendix 2 and Table A2.1 in the SA Report that was published alongside the Proposed Submission Plan in 2017 (PR43).</p> <p>The 2019 SA Addendum (PR113b) contains an SA of reasonable options and of a schedule of proposed modifications to the Proposed Submission Plan (2017). The 2019 SA Addendum (PR113b) concludes that although there will be negative effects associated with the</p>

		<p>reallocation of the 410 homes from PR10 to allocation Policies PR6a, PR6b, PR7a, PR7b and PR9, overall, the significance of these adverse effects has not changed from those already identified through the SA of the original number of homes allocated at each location. SA Addendum Appendix 1, setting out the additional evidence gathered to establish the likely effects of the redistribution also supports this.</p> <p>While reducing the eastward extent of site allocation PR10 and or reducing the density of development within PR10 would most likely reduce the area of open greenfield land that would be developed reducing the potential scope and significance of adverse effects against SA objectives, the same sensitivities and therefore the potential for significant negative effects still exist.</p> <p>The SA does not contain the errors alleged. The SA correctly notes that the PR10 site is in close proximity to the Blenheim Palace World Heritage Site (1.22). The SA has made reasonable judgements about the nature of the heritage impacts. The benefits of the PR10 allocation have not been ignored. The Council is cognisant of the promoter’s representations and hearing statement where the benefits of development to support the World Heritage Site are set out and which the Inspector would have been aware of in making his decision. The Council’s reasons for selecting sites, including PR10, is set out in Chapter 10 of the 2017 SA Report (PR43).</p>
<ul style="list-style-type: none"> • The legal compliance of the SA Addendum is questioned. • In legal compliance terms, the reasonable alternatives test relates to the appropriateness of the strategy (i.e. the “geographical scope of the plan”, per SEA Regulation 12(2)), not the individual sites – the strategy is plainly a 	<p>Bloombridge LLP (PR-D-0069)</p>	<p>The legal requirements for SA (and SEA) have been met. It takes account of NPPF1 (2012) and government guidance</p>

<p>plan-wide matter. As a minimum, this requires an addendum SA of the Kidlington Area of Search, as one of two “best performing areas” on sustainability grounds, per paragraph 1.39 of PR43(b), and this must also be set within the context of harm to the overall integrity of the Green Belt (which is wider than a site by site assessment).</p> <ul style="list-style-type: none"> • The Government’s guidance on sustainability appraisal confirms that the correct approach is to SA the Plan as a whole, not the sites, specifically to achieve relevant environmental, economic and social objectives. • The Council has irrationally narrowed the scope of the Addendum Sustainability Appraisal (SA) to just the “existing strategy” and it should have considered the Kidlington Area of Search as a whole. • The assessment can be iterative and therefore limited to a spatial strategy within the plan, if that strategy is settled, but the “existing strategy” still remains very much in question. • The SA Addendum should have considered the Moors site as a reasonable alternative to the main modifications. • There was no procedural benefit gained from limiting the Addendum SA to what paragraph 1.12 of PR113a describes as the “existing strategy”. A process that just looks at the existing sites (particularly in isolation to the rest of the Area of Search) is going to miss the ‘tipping point’ on the capacity of each site when avoidable or unacceptable harm is reached which, like any sustainability decision, is a balancing and comparative exercise, including in relation to reasonable alternatives. • Land at the Moors scores well in the SA and its exclusion from the Plan is irrational. • Reasonable alternatives to the modified strategy have been overlooked, making for less sustainable outcomes and unnecessary “high harm” to the Green Belt, its permanence and overall integrity. • Even operating on the working assumption that the submitted sites are sound, it does not follow that extending these sites is sound, sustainable and minimising in terms of harm to the Green Belt (noting the debate at 		<p>on SA. The Council considers the SA is comprehensive and proportionate.</p> <p>The Council’s consideration of reasonable options for the preparation of the Proposed Submission Plan is set out in sections 7, 8, 9 and 10 of the 2017 SA Report (PR43). All options have been subjected to SA using the assumptions set out in Appendix 2 and Table A2.1 in the SA Report (PR43) that was published alongside the Proposed Submission Plan in 2017. All site options in Areas of Search A and B, (those areas in closest proximity to Oxford), were assessed in the 2017 SA Report (PR43). Whilst the size of developable areas for certain site allocations would increase as a result of the Main Modifications, the increase would remain within the extent of the site appraised.</p> <p>In the case of land north of the Moors, the reasons for not selecting the site are explained at paragraphs 10.95 to 10.100 of the 2017 SA Report (PR43), referencing the SA and other considerations. Overall, the sites selected for inclusion in the Plan were considered to be the most suitable for meeting the Plan’s vision and objectives and achieving sustainable development.</p> <p>The Inspector has not raised any concerns with the 2017 SA in his Advice Note. His preliminary findings indicate the approach of locating the housing and infrastructure required as close as possible to Oxford, along the A44 and A4165 transport corridors is an appropriate strategy. The Inspector considers that the Council has demonstrated exceptional circumstances to justify removal of land from the Green Belt.</p>
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<p>the February Hearings that concluded that the site capacities were settled, and the proposed Green Belt boundaries set to endure).</p> <ul style="list-style-type: none"> • The SA mismatches with the Terms of Reference of the Plan. The key elements of this methodology require site selection decisions based on the “most sustainable locations”. • Cherwell’s narrow approach to the addendum SA cannot, on the evidence, confirm that the Partial Review is sustainable or that the reconfigured sites are in the “most sustainable locations”. • The SA downplayed the role of the Green Belt with too much focus on exceptional circumstances and not enough on the sustainability consequences associated with defining new Green Belt boundaries. 		<p>The Inspector has advised, ‘With one exception...I regard the various allocations, and the process by which they have been arrived at, as sound, in principle...’. The site that the Inspector has concerns with is the only site (PR10 – land south east of Woodstock) that the Council originally proposed which is situated outside of the Oxford Green Belt.</p> <p>Other than this site, the Council has no reason to question its site selection process to date, including the non-selection of all reasonable alternatives to the proposed site allocations considered to date (including land north of the Moors).</p> <p>Consequently, consideration of reasonable alternatives to the redistribution of the 410 homes in the 2019 SA Addendum (PR113b) has focussed exclusively on options that relate to accommodating additional homes within the scope of the existing strategy; specifically, on or in the immediate vicinity of the existing site allocations and options within the Plan Policies PR3a-PR10. All these options are considered to be reasonable to consider.</p> <p>The 2019 SA Addendum (PR113b) contains an SA of reasonable options and an SA of a schedule of proposed modifications to the proposed submission Plan (2017). Paragraph 1.151 of the SA Addendum concludes that although there will be negative effects associated with the reallocation of the 410 homes from PR10 to allocation Policies PR6a, PR6b, PR7a, PR7b and PR9, the significance of these adverse effects has not changed from those already identified through the SA of the original number of homes allocated at each location. SA Addendum Appendix 1, setting out the additional evidence gathered to establish the likely effects of the redistribution also supports this.</p>
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<ul style="list-style-type: none"> • Objects to the approach that PR3(a) was assessed as a single option. The respondent’s site should have been assessed as an independent option, given the relationship to PR8 proposals, the existing urban influences on this land and the opportunity to provide suitable access from the A44. • The SA addendum identifies that the likely significant effects of releasing land within PR3(a) are likely to be less harmful than the options taken forward. • Objection is raised for not taking forward option 2. This forms approximately 7.8 ha of land identified as suitable for removal from the Green Belt and as suitable for development. 	<p>Edgars for Mr and Mrs Tomes (PR-D-0087)</p>	<p>The Council’s consideration of reasonable options for preparation of the proposed submission Plan is set out in sections 7, 8, 9 and 10 of the 2017 SA Report (PR43). All options have been subjected to SA using the assumptions set out in Table A2.1 in the SA Report that was published alongside the proposed submission Plan in 2017 (PR43). The sites selected for inclusion in the Plan were considered to be the most suitable for meeting the Plan’s vision and objectives and achieving sustainable development.</p> <p>The proposed safeguarded land - Site PR3(a) was assessed in the SA. The Council’s strategy had already been selected and further sites submitted were not considered.</p>

		<p>The 2019 SA Addendum (PR113b) and the Council’s Explanatory Note explain the reasons for the approach set out in the Council’s modifications.</p>
<ul style="list-style-type: none"> • The results of the SA cannot be supported by a reasonable person when comparing the findings in relation to PR6c with those for PR7a and PR7b. • An alternative appraisal of site PR6C is provided by the promoter and they contend that their promoted site be selected rather than those proposed to be allocated. • The credentials of PR6c are diluted or dismissed entirely as a result of CDC’s decision to apply mitigating factors to sites PR7a and b without doing the same at PR6c, disregarding the fact that these could be included via an intricately worded policy. 	<p>Turnberry for Exeter College (PR-D-0081)</p>	<p>The Council’s consideration of reasonable options for preparation of the proposed submission Plan is set out in sections 7, 8, 9 and 10 of the 2017 SA Report (PR43). All options have been subjected to SA using the assumptions set out in Table A2.1 in the SA Report (PR43) that was published alongside the proposed submission Plan in 2017. All site options in Areas of Search A and B, (those areas in closest proximity to Oxford), were assessed in the 2017 SA Report (PR43). The sites selected for inclusion in the Plan were considered to be the most suitable for meeting the Plan’s vision and objectives and achieving sustainable development.</p> <p>In response to the promoter’s representation concerning the application of mitigating factors, the Council’s approach is consistent with the SA of reasonable alternatives set out in sections 7, 8 and 9 of the SA Report (PR43) prepared alongside the Proposed Submission Plan in 2017. Mitigation was considered in Chapter 10 of the 2017 SA report (PR43). The process followed for the assessment of PR6c is explained in paragraphs 1.117 to 1.118 of the SA addendum (PR113b).</p> <p>The 2019 SA Addendum (PR113b) at Table 1 sets out the options considered by the Council in preparing the main modifications. The Council considers the scoring and SA process undertaken in the 2019 SA addendum (PR113b) robust. The SA Addendum and the Council’s Explanatory</p>

		note set out the methodology and explain the reasons for the approach set out in the Council's modifications.
<ul style="list-style-type: none"> Reference is made to paras 1.104 and 1.146 of the SA in support of the respondent's view that the development of homes at site PR9 could take place sensitively within a broader area. 	Gerald Eve LLP for Merton College (PR-D-0084)	Noted.
<ul style="list-style-type: none"> The SA is biased and does not address local concerns. The Plan does not protect or enhance landscape character and quality or make accessible countryside for use and enjoyment. The effect to water supply and water quality should be recognised as significant problem as part of the plan. Building in the floodplain is not advisable. 	Fiona Gibson (PR-D-0052)	<p>Natural England, the Environment Agency and Historic England were consulted on the SA Scoping Report published in January 2016 (PR25). Public consultation has also taken place on an Initial SA Report (PR23), SA Report (PR43) and SA addendum (PR113b). Appendix 3 of the SA Report (PR43) provides a summary of the consultation responses and explains how they were considered and addressed.</p> <p>The SA and plan-making have been informed by appropriate evidence throughout as evidenced by the Scoping Report (PR25), Issues and Options Consultation Papers, the Initial SA Report (PR23), the SA Report (PR43), the SA addendum (PR113b), the Statement of Consultation (PR93) and submitted evidence base.</p>
<ul style="list-style-type: none"> The representation compares the Council's original assessment of Policy PR7a in the 2017 SA Report (PR43) with the appraisal in the SA addendum (PR113) and provides a commentary. 	Turley for land south east of Kidlington (PR-D-0054)	<p>All options have been subjected to SA using the assumptions set out in Appendix 2 and Table A2.1 in the SA Report (PR43) that was published alongside the Proposed Submission Plan in 2017.</p> <p>The 2019 SA Addendum (PR113b) concludes that although there will be negative effects associated with the reallocation of the 410 homes from PR10 to allocation Policies PR6a, PR6b, PR7a, PR7b and PR9, overall, the significance of these adverse effects has not changed from</p>

		<p>those already identified through the SA of the original number of homes allocated at each location.</p> <p>The 2019 SA Addendum (PR113b) at Table 1 sets out the options considered by the Council in preparing the main modifications. The Council considers the scoring and SA process undertaken in the 2019 SA Addendum (PR113b) robust. The SA Addendum and the Council’s Explanatory note set out the methodology and explain the reasons for the approach set out in the Council’s modifications. Site PR7a is a site proposed for allocation by the Council in the Partial Review which the promoter is supporting.</p>
<ul style="list-style-type: none"> • Objection is raised to modification 80 and that the SA addendum does not provide any evidence to support the change. It implies that the change is made in order to mitigate the loss of agricultural land and the potential for soil improvement is limited. 	<p>Pegasus for Barwood (PR-D-0014)</p>	<p>The SA Addendum (PR113b) provides an assessment of the modification and no significant effects are identified. The change is made to mitigate against the effects of development generally. (see the Council’s response to modification 80 above).</p>